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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SURGICAL INSTRUMENT SERVICE COMPANY, INC.,

Case No. 3:21-cv-03496-AMO

INTUITIVE'S OBJECTIONS TO PLAINTIFF SIS's TRIAL EXHIBITS

Date: November 25, 2024
Time: 11:00 a.m.
Courtroom: 10

The Honorable Araceli Martínez-Olguín

1 Pursuant to the Court's Schedule and Pretrial Order of June 11, 2024, Dkt. 235,
2 Defendant Intuitive Surgical, Inc. ("Defendant" or "Intuitive") hereby submits Intuitive's
3 Objections to Plaintiff SIS's Trial Exhibits. Intuitive serves its objections subject to the
4 following reservations:

5 Defendant reserves the right to modify, supplement, amend, or withdraw its objections to
6 any of the exhibits listed on Plaintiff's exhibit list to the extent any objections were inadvertently
7 omitted, included, or otherwise made (or not made) in error. Defendant reserves the right to
8 raise any objection, including objections not listed herein, to any exhibit offered by Plaintiff at
9 trial in light of the context or purpose for which the exhibit is being offered, including if the
10 exhibit constitutes unduly cumulative evidence or causes undue delay. Defendant likewise
11 reserves the right to raise additional objections to exhibits Plaintiff's experts may rely upon,
12 should Plaintiff seek to publish those exhibits to the jury or admit those exhibits into evidence.

13 Defendant objects to the admission of any exhibit listed here for which Plaintiff fails to
14 establish authenticity, lay a proper foundation, or otherwise fails to establish a necessary
15 predicate for admission. By listing or omitting evidentiary objections herein, Defendant does not
16 concede the relevance, foundation, authenticity, or admissibility of such evidence.

17 Defendant's identification of evidentiary objections here does not limit, in any way, the
18 scope of any of Defendant's *in limine* motions seeking the exclusion of evidence listed on
19 Plaintiff's exhibit list, including as to exhibits for which no objection is raised here.

20 Defendant reserves the right to raise additional objections to Plaintiff's exhibits based on
21 (i) court rulings before or during trial, including rulings on *in limine* motions; (ii) events
22 occurring at trial, including the cumulative presentation of redundant evidence or other forms of
23 unnecessary delay; or (iii) Plaintiff's identification of additional exhibits that present further
24 grounds for objecting to those listed here.

25 Defendant reserves the right to and does object to any exhibits on Plaintiff's exhibit list
26 that Plaintiff does not make available to Defendant despite Defendant's requests for such. This
27 reservation includes TX348, TX889, and TX891.

28

The numbers listed in Defendant's objections refer to the corresponding Federal Rule of Evidence; "802" encompasses all forms of hearsay objections including but not limited to hearsay within hearsay; "602" includes but is not limited to objections for lack of foundation.

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
121	05/26/2022 Email from K. May to C. Parker re Restore Robotics Repairs Investor deck 220524 cp.pptx, with attachments. (Restore-00094918 - Restore-00094956)	602, 703, 801, 802
136	09/25/2019 Email chain ending in email from K. Johnson to T. Brooks et al. re UMC Tucson, with attachments. (SIS095115 - SIS095139)	602, 701, 801, 802, 703
155	06/28/2022 Email from D. Gunn to K. May et al. re Instruments for Xi robot, with attachments. (Restore-00091199 - Restore-00091206)	602, 703, 801, 802
256	06/23/2015 RAI FDA Letter K143619 S002 Deficiencies. (REBOTIX171030 - REBOTIX171057)	106
270	10/22/2018 White Paper: Evaluating Whether Activities are Servicing or Remanufacturing.	403, 702, 703
279	04/25/2019 EndoWrist Service Procedure, by Greg Fiegel. (REBOTIX162404 - REBOTIX162424)	403, 602, 701, 702, 703, 801, 802
285	05/10/2021 SIS v. Intuitive - Complaint.	403, 701, 703, 801, 802
321	“da Vinci SP” page of the Intuitive website	401, 402
322	11/28/2022 “Patent Notice” page of the Intuitive website as of November 28, 2022	401, 402, 403
323	06/24/2021 “Remanufacturing of Medical Devices -- Draft Guidance for Industry and Food and Drug Administration Staff” (published by the FDA on June 24, 2021)	

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324	02/23/2021 “TransEnterix Announces Name Change to Asensus Surgical and Introduces a New Category of Surgery, Performance-Guided Surgery,” Business Wire, February 23, 2021	
325	“Engineering Failure Analysis, Fatigue & Mechanical Tests: DNV Labs.”	403, 602, 703, 801, 802
326	02/22/2022 “Intuitive faces down the competition” by Elizabeth Cairns (February 22, 2022)	403, 602, 701, 702, 703, 801, 802
327	01/02/2006 “Medical Device and Radiological Health Regulations Come of Age”, Carol Rados, published in the FDA Consumer (2006)	401, 402, 403
328	04/05/2023 “Medtronic’s Hugo too similar to Intuitive’s surgical robot to displace the market incumbent: analysts” by Nick Paul Taylor (April 5, 2023)	403, 602, 701, 801, 802,
329	10/28/2021 “What does J&J’s Ottawa delay mean for Intuitive and Medtronic? It’s complicated” by Ricky Zipp (October 28, 2021)	403, 602, 701, 801, 802
330	03/04/2016 81 Fed. Reg. 43 (Mar. 4, 2016)	106, 401, 402, 403
331	06/01/1934 A.P. Lerner, “The Concept of Monopoly and the Measurement of Monopoly Power,” The Review of Economic Studies, Vol. 1, No. 3, 1934, 157-175	
332	12/19/2013 Abhishek Trehan and Tristan J. Dunn, “The robotic surgery monopoly is a poor deal,” The BMJ, Vol. 347, December 19, 2013, 1-2	401, 402, 403, 602, 701, 703, 801, 802
333	03/28/2022 Clarifying Remanufacturing to Protect Patient Safety Act of 2022 (H. R. 7253)	401, 402, 403, 602
334	05/05/2021 AHP000527–AHP000537 (AHP000527 - AHP000537)	106
335	01/01/2006 American Institute of Certified Public Accountants (AICPA) Practice 06-4 (2006)	602, 801, 802

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336	09/04/2018 Andrew Brodie and Nikhil Vasdev, "The future of robotic surgery: How robotics could help shape the future of surgical care," Annals of the Royal College of Surgeons of England, September 4, 2018.	403, 701, 703, 801, 802
337	10/06/2018 Andrew Gonzalez, M.D., J.D., MPH and Anna Giorgi, "Laparoscopy," Healthline, October 6, 2018	
338	2004/01 Anthony R. Lanfranco, BAS, Andres E. Castellanos, MD, Jaydev P. Desai, PhD, and William C. Meyers, MD, "Robotic Surgery: A Current Perspective," Annals of Surgery, Vol. 239, No. I, January 2004	401, 402, 403, 703, 801, 802
339	01/01/2018 Association of International Certified Public Accountants (AICPA) Forensic & Valuation Services Practice Aid – Calculating Lost Profits (2018)	602, 801, 802
340	12/19/2018 Benjamin M. Zegarelli, Observations from FDA's Public Workshop on Medical	401, 402, 403, 602, 701, 801, 802
341	05/29/2019 Bingmer et al., Decline of Open Surgical Experience for General Surgery Residents, Springer Nature, May 29, 2019	403, 801, 802
342	BPI Medical is a "full service medical equipment company." See BPI Medical, "About Us."	106, 401, 402, 403, 602, 801, 802
343	02/12/2014 Candi Helseth, "Technology Widens Care Options for Rural Hospitals," The Rural Monitor, February 12, 2014	403, 703, 801, 802
344	07/12/2022 Congressional Record Volume 148, Issue 137 – Part II (July 12, 2002)	401, 402, 403
345	10/19/2022 Conor Hale, "Medtronic's Hugo surgical robot collects green lights in Europe, Canada, Japan," Fierce Biotech, October 19, 2022	801, 802

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346	da Vinci Xi Instrument Reprocessing Instructions for Automated Cleaning and Disinfection, PN 554324-01 Rev. B	
347	03/18/2019 Daren Fonda, "Intuitive Surgical Faces New Competition and FDA Concerns," Barrons, March 18, 2019	401, 402, 403, 602, 801, 802
348	04/14/2015 Dennis Carlton and Jeffrey Perloff, Modern Industrial Organization. Fourth Edition Global, Reading, MA: Addison Wesley, 2015	RESERVED. Requested that SIS identify specific pages or chapter of this textbook that it seeks to admit as evidence. Defendant provisionally objects pursuant to FRE 106, 401, 402, 403, 801, 802
349	Department of Health and Human Services FDA 8mm Monopolar Curved Scissors "Indications for Use" - 510(k) clearance letter	
350	12/19/2018 Device Servicing and Remanufacturing, Nat'l Law Review (Dec. 19, 2018)	403, 602, 801, 802
351	03/30/2020 Dr. Ivan De Backer, "Dissecting the Robotic Surgery Market," IDTechEx, March 30, 2020	403, 701, 703, 801, 802
352	01/01/2024 DS28EC20 20kb1-Wire EEPROM Datasheet	602, 801, 802
353	07/22/2022 E-mail correspondence between FDA and Rebotix, from December 13, 2021 – July 22, 2022	602, 801, 802, 803
354	12/10/2020 Enlightened Capital, "Intuitive Surgical (SRG) Investment Analysis," December 10, 2020	403, 701, 703, 801, 802
355	10/17/2020 Eve Cunningham, MD, MBA, "Op-Ed: Addressing Our Da Vinci Addiction - A call to action for everyone in healthcare," MedPage Today, October 17, 2020, available at https://www.medpagetoday.com/surgery/general-surgery/89175	403, 701, 703, 801, 802
356	08/07/2024 FDA Medical Device Quality System (QS) regulation, 21 CFR § 820, and Preamble	401, 402, 403, 901

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357	08/18/2017 FDA Reauthorization Act of 2017, as introduced (H. R. 2430)	
358	08/18/2017 FDA Reauthorization Act of 2017, as passed (131 Stat. 1005)	
359	01/01/2018 FDA Report on the Quality, Safety, and Effectiveness of Servicing of Medical Device (May 2018)	401, 402, 403
360	09/30/2022 FDA September 30, 2022, Letter to Rick Ferreira, Iconocare Health, re: 8mm Monopolar Curved Scissors – 510(k) clearance letter	
361	11/13/2018 FDA Staff Manual Guides entitled “Determination of Classification of Devices” dated November 13, 2018	401, 402, 403, 702
362	FDA, “FDA’s Role in Regulating Medical Devices”	401, 402, 403, 901
363	FDA, “What We Do.”	403, 901
364	11/15/2022 FDA. November 15, 2022 Letter re K210478 / FDA 510(k) Summary for 510(k) K210478 (SIS357813 - SIS357818)	
365	09/01/1987 FDA. Compliance Policy Guide; CPG Sec. 300.100 Inspection of Manufacturers of Device Components. Sep. 1987	401, 402, 403
366	12/29/1987 FDA. CPG 7124.28, Reconditioners/Rebuilders of Medical Devices, on December 29, 1987	401, 402, 403
367	03/18/2005 FDA. CPG Sec. 300.500. Reprocessing of Single Use Devices. 18 Mar. 2005	
368	10/25/2017 FDA. Deciding When to Submit a 510(k) for a Change to an Existing Device Guidance for industry and Food and Drug Administration Staff. 10 Oct 2017 available at https://www.fda.gov/media/99812/download	

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369	06/29/1994 FDA. Johnson R, Director of the Office of Compliance. Memorandum to Office of Compliance Staff. 29 Jun. 1994	401, 402, 403
370	12/20/2017 FDA. Medical Device Accessories – Describing Accessories and Classification Pathways Guidance for Industry and Food and Drug Administration Staff. 20 Dec. 2017	401, 402, 403
371	11/03/1999 Fed. Reg. 212 (Nov. 3, 1999)	401, 402, 403
372	06/25/1938 Federal Food, Drug and Cosmetic Act of 1938 (52 Stat. 1040)	702
373	12/23/1997 Federal Register of December 23, 1997 (Vol. 62, No. 246)	401, 402, 403
374	07/18/2016 Federal Register of July 18, 2016 (Vol. 81, No. 137)	401, 402, 403
375	10/07/1996 Federal Register of October 7, 1996 (Vol. 61, No. 195)	
376	10/28/2020 FRANCISCAN-00056312–FRANCISCAN-00056338 (FRANCISCAN-00056312 - FRANCISCAN-00056338)	801, 802
377	Handwritten Note Regarding Competitive Installs	401, 402, 403, 602, 701, 801, 802, 901
378	06/27/1905 Herbert Hovenkamp, The Antitrust Enterprise, Cambridge, MA: Harvard University Press, 2005	403
379	05/31/2018 http://investor.intuitivesurgical.com/news-releases/news-release-details/intuitive-surgical-announces-innovative-single-port-platform-da	401, 402
380	http://www.fda.gov/ICECI/ComplianceManuals/RegulatoryProcedures%20Manual/ucm176446.htm	401, 402, 403, 602, 701
381	https://bmpmedical.com/reasons-to-switch-to-single-use-medical-devices-and-disposable-medical-supplies/	401, 402, 701, 703, 801, 802
382	https://healthtrustpg.com/about-healthtrust/	401, 402, 703, 801, 802

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383	03/01/2021 https://internetofthingsagenda.techtarget.com/definition/RFID-radio-frequency-identification	602, 703, 801, 802
384	10/05/2016 https://investors.premierinc.com/news/press-release-details/2016/Premier-Inc-and-Banner-Health-Expand-Partnership/default.aspx	401, 402, 703, 801, 802
385	06/06/2022 https://newsroom.vizientinc.com/en-US/releases/vizient-announces-11-member-agreements-for-q1-2022	403, 602, 703, 801, 802
386	https://stanfordhealthcare.org/medical-treatments/g/general-surgery/types.html	
387	https://supplychainassociation.org/about-us/what-is-gpo/	401, 402, 703, 801, 802
388	02/26/2017 https://thoracickey.com/robotics-in-cardiac-surgery-basic-principles	106, 602, 701, 801, 802
389	01/01/2019 https://web.archive.org/web/20191108191050/ https://www.vizientinc.com/what-we-do	403, 602, 703, 801, 802
390	04/19/2014 Jaimy Lee, "Surgical-Robot Costs Put Small Hospitals in a Bind," Modern Healthcare, April 19, 2014 available at https://web.archive.org/web/20220324014644/ https://www.modernhealthcare.com/article/20140419/MAGAZINE/304199985/surgical-robot-costs-put-small-hospitals-in-a-bind	403, 602, 703, 801, 802
391	02/23/2024 https://www.aha.org/statistics/fast-facts-us-hospitals	
392	03/04/2016 https://www.atlasrfidstore.com/rfid-insider/active-rfid-vs-passive-rfid	602, 703, 801, 802

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393	04/01/2022 https://www.cancercenter.com/treatment-options/surgery/surgical-oncology/robotic-surgery	602, 701, 801, 802
394	01/01/2024 https://www.carevoyance.com/blog/acute-care-hospitals	403, 602, 703, 801, 802
395	05/15/2024 https://www.cdc.gov/oralhealth/infectioncontrol/faqs/single-use-devices.html	403, 602, 703, 801, 802
396	04/08/2024 https://www.definitivehc.com/blog/how-many-hospitals-are-in-the-us	
397	07/10/2024 https://www.definitivehc.com/blog/top-10-gpos-by-staffed-beds	403, 602, 703, 801, 802
398	https://www.easmed.com/surgical-robot-flex-system/	403, 602, 703, 801, 802
399	01/01/2023 https://www.fda.gov/industry/medical-device-user-fee-amendmentsmdufa/medical-device-user-fee-amendments-2022-mdufa-v	401, 402, 403
400	05/01/2018 https://www.fda.gov/media/113431/download	
401	05/10/2024 https://www.fda.gov/media/150141/download	
402	09/28/2022 https://www.fda.gov/media/80958/download	401, 402, 403, 602, 801, 802
403	01/10/2023 https://www.fda.gov/medical-devices/products-and-medical-procedures/reprocessing-reusable-medical-devices	901
404	09/29/2022 https://www.fda.gov/medical-devices/digital-health-center-excellence/devicesoftware-functions-including-mobile-medical-applications	401, 402, 403, 602, 801, 802

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405	08/22/2024 https://www.fda.gov/medical-devices/premarket-submissions-selecting-and-preparing-correct-submission/premarket-notification-510k	401, 402, 403, 901
406	08/12/2021 https://www.fda.gov/medical-devices/quality-and-compliance-medical-devices/discussion-paper-strengthening-cybersecurity-practices-associated-servicing-medical-devices	401, 402, 403, 602, 801, 802
407	08/07/2024 https://www.fda.gov/medical-devices/quality-system-qs-regulationmedical-device-goodmanufacturing-practices/medical-devices-current-good-manufacturing-practice-cgmpfinal-rule-quality-system-regulation	401, 402, 403
408	01/12/2018 https://www.fda.gov/medical-devices/reprocessing-reusable-medicaldevices/what-are-reusable-medical-devices	403, 901
409	09/17/2018 https://www.fda.gov/radiation-emitting-products/electromagnetic-compatibility-emc/radiofrequency-identification-rfid	401, 402, 403, 602, 801, 802
410	05/01/2024 https://www.fda.gov/regulatory-information/search-fda-guidance-documents/remanufacturing-medical-devices	403
411	03/04/2016 https://www.federalregister.gov/documents/2016/03/04/2016-04700/refurbishing-reconditioning-rebuilding-remarketing-remanufacturing-and-servicing-of-medical-devices	
412	12/04/1998 https://www.govinfo.gov/content/pkg/FR-1998-12-04/pdf/98-32249.pdf	401, 402, 403, 602, 701, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
413	https://www.intuitive.com/en-us/about-us/newsroom/press-resources	403, 404(b), 602, 801, 802
414	https://www.intuitive.com/en-us/patients/patients	
415	https://www.intuitive.com/en-us/products-and-services/da-vinci/systems	
416	https://www.intuitivesurgical.com/products/skills_simulator/index.php	
417	08/19/2010 U.S. Department of Justice and the Federal Trade Commission, "Horizontal Merger Guidelines," August 19, 2010, available at https://www.justice.gov/atr/horizontal-merger-guidelines-08192010	403, 703
418	https://www.loyolamedicine.org/find-a-condition-or-service/surgical-services/minimally-invasive-surgery	
419	01/11/2024 https://www.mayoclinic.org/departments-centers/robotic-orthopedic-surgery/overview/ovc-20472153	403, 602, 701, 801, 802
420	09/23/2023 https://www.mayoclinic.org/tests-procedures/minimally-invasive-surgery/about/pac-20384771	403, 602, 701, 801, 802
421	10/26/2016 https://www.medicaldevice-developments.com/features/featuregood-as-new---reprocessing-single-use-devices-5663983/	401, 402, 403, 602, 701, 801, 802
422	https://www.medstarhealth.org/services/robotic-surgery	
423	https://www.rfidjournal.com/faq/whats-the-difference-between-passive-and-active-tags	602, 703, 801, 802
424	07/29/2019 https://www.sages.org/publications/tavac/da-vinci-sp-surgical-system-endowrist-sp-instruments-and-accessories/	401, 402, 403, 602, 701, 801, 802

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425	https://www.springer.com/journal/11701/aims-and-scope	401, 402, 403, 602, 801, 802
426	https://www.vizientinc.com	403, 602, 703, 801, 802
427	https://www.yankeealliance.com/content/premi-er-certified-sponsor-affiliates	401, 402, 602, 703, 801, 802
428	01/01/2016 IIA AREEDA & HOVENKAMP, ANTITRUST LAW, ¶564b (Wolters Kluwer IntelliConnect CCH Edition, 2016)	401, 402, 403, 702, 703
429	01/20/2017 Instrument eX: I&A Refurbishment Feasibility Update, 30 January 2017 (Intuitive-00147379 - Intuitive-00147412)	403, 602, 801, 802
430	02/13/2019 Email "FW: Si service and Instrument reprocessing" (Intuitive-00214231 - Intuitive-00214234)	401, 402, 403, 602, 801, 802
431	08/15/2022 Intuitive K214095510(k) Clearance and Summary: da Vinci X/Xi 8mmReusable Instruments	
432	Intuitive Patent Notice pursuant to 35 U.S.C. § 287(a)	401, 402, 403, 602
433	04/29/2005 Intuitive Surgical 510(k) K050369 clearance	
434	Intuitive Surgical 510(k) K081177 clearance	
435	09/17/2014 Intuitive Surgical 510(k) K123329 clearance	
436	Intuitive Surgical 510(k) K170644 clearance	
437	Intuitive Surgical 510(k) K180033 clearance	
438	02/10/2021 Intuitive Surgical Form 10-K, FY2020	403
439	02/03/2022 Intuitive Surgical Form 10-K, FY2021	403
440	Intuitive Surgical, "About da Vinci Systems" (hereafter "About da Vinci Systems")	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
441	05/01/2014 Intuitive Surgical, "Endo Wrist/Single-Site Instrument & Accessory Catalog," May 2014	403
442	Intuitive Surgical, "Intuitive for Patients" (hereafter "Intuitive for Patients").	
443	Intuitive Surgical, "Move Surgery Forward. Again. da Vinci SP."	
444	12/31/2000 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2000	403
445	04/01/2002 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2001	403
446	03/16/2005 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2004, filed March 16, 2005	403
447	03/15/2006 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2005, filed March 15, 2006	403
448	01/20/2011 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2010, filed February 1, 2011	403
449	01/20/2012 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2018	403
450	01/17/2020 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2019, filed February 7, 2020	403
451	01/15/2021 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2020, filed February 10, 2021	403
452	01/26/2022 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2021, filed February 3, 2022	403

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
453	02/07/2023 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2022	403
454	02/10/2023 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2022, filed February 10, 2023	403
455	01/31/2023 Intuitive Surgical, Inc., Form 10-K for the fiscal year ended December 31, 2023, filed January 31, 2023	403
456	07/19/2024 Intuitive Surgical, Inc., Form 10-Q for the quarter ended June 30, 2024, filed July 19, 2024	403
457	04/19/2024 Intuitive Surgical, Inc., Form 10-Q for the quarter ended March 31, 2024, filed April 19, 2024	403
458	10/21/2022 Intuitive Surgical, Inc., SEC Form 10-Q Dated September 2022, filed October 21, 2022	403
459	Intuitive's October 2021 Instrument and Accessory Catalog X Xi.pdf	
460	2014-05 - Document - Intuitive Surgical, "Endo Wrist/Single-Site Instrument & Accessory Catalog," (Intuitive-00000105 - Intuitive-00000128)	
461	2014-05 - Document - Intuitive Surgical, "Endo Wrist/Single-Site Instrument & Accessory Catalog," (Intuitive-00000129 - Intuitive-00000156)	
462	07/16/2020 White Paper, Extended Lives Supporting Materials (Intuitive-00004692 - Intuitive-00004704)	106
463	04/03/2014 2014-04 - Document - Intuitive "Instruments and Accessories User Manual (PN 550675-06 Rev. G)" (Intuitive-00000501 - Intuitive-00000639)	
464	08/31/2018 Business Alignment Meeting Presentation (Intuitive-00001237 - Intuitive-00001311)	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
465	09/01/0214 Da vinci Surgical Systems Si User Manual (Intuitive-00002201 - Intuitive-00002501)	
466	03/01/2019 Document - Intuitive "da Vinci Xi System User Manual (PN 551400-13 Rev. A)" (Intuitive-00002502 - Intuitive-00002876)	
467	05/29/2020 Extended life project: estimated revenue and margin impact (Intuitive-00005068 - Intuitive-00005108)	401, 402, 403, 602
468	01/05/2017 Sales, License, and Service Agreement - South Broward Hospital (Intuitive-00005135 - Intuitive-00005147)	
469	07/29/2019 Email - RE: da Vinci System and 3rd Party Resetting I&A Lives (Intuitive-00009500 - Intuitive-00009502)	
470	01/23/2018 Email - RE: Link to Recording for Don B - VP Purchasing (Intuitive-00011487 - Intuitive-00011487)	
471	04/02/2019 Email from S. Sathyamurthy to A. Yiu et al. re Throughs on Intelligent Surgery Campaign (Intuitive-00014395 - Intuitive-00014396)	
472	12/04/2018 Order Confirmation - UCLA Medical Center - with ISRG T&C (Intuitive-00019658 - Intuitive-00019659)	106, 401, 402, 403, 602
473	2019-05-07 Letter - ISRG to Pacific Coast Surgical Center - use of repaired instruments (Intuitive-00019774 - Intuitive-00019775)	106, 403, 602
474	2016-10-26 - Email - Subject: "ReWrite LivesPlus 5XiSiEquivalence.docx" (Intuitive-00027298 - Intuitive-00027298)	106, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
475	02/01/2017 Document - Intuitive "ReWrite_LivesPlus5XiSiEquivalence" (Intuitive-00027299 - Intuitive-00027303)	106, 801, 802
476	02/14/2017 Intuitive Surgical Function Requirements (Intuitive-00027311 - Intuitive-00027317)	106, 401, 402, 403
477	09/25/2018 Email - "Subject W: 10+ use instruments" (Intuitive-00029174 - Intuitive-00029174)	106, 401, 402, 403
478	2018-11-08 - Document - Intuitive "Instrument Performance Metrics (Design Review)" (Intuitive-00029273 - Intuitive-00029333)	106, 602
479	11/30/2018 E-mail chain culminating in a November 30, 2018 e-mail from alph Wadensweiler to Grant Duque (Intuitive-00029346 - Intuitive-00029347)	106, 403, 602, 801, 802
480	2018-10-25 - ISRG letter to Conway Regional Medical Center (Intuitive-00032916 - Intuitive-00032917)	106, 403, 602, 801, 802
481	2017-01-30 - Powerpoint - Instrument eX: I&A Refurbishment Feasibility Update (Intuitive-00042937 - Intuitive-00042972)	
482	08/14/2019 - ISRG letter to Citizens Medical Center (Intuitive-00044508 - Intuitive-00044508)	
483	2019-09-11 - ISRG letter to Crescent City Surgical Center (Intuitive-00044524 - Intuitive-00044526)	
484	2019-09-09 - ISRG letter Pullman Regional Hospital (Intuitive-00044528 - Intuitive-00044530)	
485	2019-07-29 - Document - Intuitive letter to McLaren Greater Lansing (Intuitive-00044535 - Intuitive-00044535)	
486	2016-08-23 - Document - Intuitive letter to Hospital Corporation of America (Intuitive-00047082 - Intuitive-00047082)	106, 401, 402, 403

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
487	2019-07-23 - Document - Intuitive letter to White County Medical Center (Intuitive-00048760 - Intuitive-00048760)	106, 602
488	2019-11-04 - ISRG letter to Jackson Madison County General Hospital - (Intuitive-00049014 - Intuitive-00049016)	106, 403, 602, 801, 802
489	11/26/2019 Email RE: Marin General - reprocessing Si instruments (Intuitive-00049108 - Intuitive-00049112)	106, 602, 801, 802
490	2019-11-26 - Email RE: Marin General - reprocessing Si Instruments (Intuitive-00049128 - Intuitive-00049132)	106, 403, 602, 801, 802
491	2019-11-26 - Document - Letter from Intuitive to Marin General Hospital (Intuitive-00049154 - Intuitive-00049156)	
492	10/09/2017 Architectural Requirements, Instruments, SP1098 (Intuitive-00050034 - Intuitive-00050064)	106, 403, 602
493	2019-08-15 - Document - Sales, License, and Service Agreement between Intuitive Surgical and Conway Regional Medical Center, Inc. d/b/a Conway Regional Health System (Intuitive-00067540 - Intuitive-00067547)	106, 602
494	05/03/2019 2019-05-02 - Presentation - Intelligent Surgery Campaign (Intuitive-00073538 - Intuitive-00073559)	
495	2019-08-28 - Presentation - Intuitive "Instrument Journey Mapping and Refurbishment Models" (Intuitive-00086011 - Intuitive-00086082)	106, 403, 602, 801, 802
496	09/18/2019 Presentation - Intuitive "Unauthorized Instrument Reprogramming Overview" (Intuitive-00089767 - Intuitive-00089782)	106, 403, 602, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
497	2016 - Document - "Intuitive da Vinci Xi Reprocessing Instructions (PN 551490-08 Rev. B)" (Intuitive-00091257 - Intuitive-00091351)	106, 602
498	10/16/2018 Quantify the Impact (QTI) Tool and Volume Estimator (Intuitive-00092805 - n/a)	
499	03/01/2018 Document - Intuitive "da Vinci Xi Surgical System User Manual (PN 551400-11 Rev. B)" (Intuitive-00096563 - Intuitive-00096864)	
500	07/06/2017 Excel - Intuitive "Refurb Business Model - minimal.xlsx" (Intuitive-00098370 - n/a)	106, 401, 402, 403
501	2017-07-24 - Excel - Intuitive "Refurb Bus. Model 7.24.17.xlsx" (Intuitive-00098681 - n/a)	106, 401, 402, 403
502	06/04/2018 Email - Subject: "CMR" - Deposition of Glenn Vavoso (May 14, 2021), Exhibit 13 (Intuitive-00100409 - Intuitive-00100412)	401, 402, 403, 801, 802
503	09/01/2016 Presentation - "Managing the Long Tail of daVinci Si" (Intuitive-00102938 - Intuitive-00102989)	106, 602, 401, 402, 403, 602, 801, 802
504	07/12/2017 Presentation - Intuitive "Instrument Refurbishing (Project Dragon)" (Intuitive-00103407 - Intuitive-00103426)	106, 403, 602, 801, 802
505	2017-07-12 - Presentation - Instrument Refurbishing (Project Dragon) (Intuitive-00103456 - Intuitive-00103478)	106, 403, 602, 801, 802
506	10/11/2017 Email - Subject: Dragon Att.: "DragonOps Meeting FINAL '2017-07-12 - Instrument Refurbishing (Project Dragon)" (Intuitive-00104182 - Intuitive-00104207)	403, 801, 802
507	06/28/2019 Email - Intuitive internal correspondence regarding Evergreen Hospital "re-chipping" EndoWrists (Intuitive-00106127 - Intuitive-00106128)	106, 403, 602, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
508	09/09/2019 Email - RE: 3rd Party ISI Instruments (Intuitive-00110242 - Intuitive-00110243)	106, 602, 801, 802
509	09/14/2019 Email - Subject: "FW da Vinci EndoWrist Savings Opportunity (MS4788 - Surgical Instrument Repair" at UF Shands (Intuitive-00110252 - Intuitive-00110254)	602, 801, 802
510	09/14/2019 Email RE: Quotes from VOC on system price/cost perception etc (Intuitive-00110255 - Intuitive-00110258)	602, 801, 802
511	12/02/2019 Email RE: Marin General - Reprocessing Si instruments (Intuitive-00110473 - Intuitive-00110478)	602, 801, 802
512	02/15/2018 E-mail from Joseph Fridlin RE: Competition Questions for Hospitals (Intuitive-00113020 - Intuitive-00113020)	106, 403, 602, 801, 802
513	04/19/2019 Document - Intuitive Internal FAQ re: Si End of Life (Intuitive-00114491 - Intuitive-0011449)	106, 401, 402, 403
514	02/21/2018 Email - Subject: "RE: Intuitive Positioning Qualitative MR: Final Report & One-Page Summary" (Intuitive-00121229 - Intuitive-00121230)	106, 401, 402, 403, 602, 701, 801, 802
515	01/11/2019 Email RE: introductions/key competitors (Intuitive-00124485 - Intuitive-00124487)	403, 602, 801, 802
516	2015-07 - Document - Robotic Surgery Financial and Strategic Overview (Intuitive-00128687 - Intuitive-00128691)	106, 401, 402, 403, 602, 801, 802
517	11/21/2019 Email - Quotes from VOC on system price/cost perception etc (Intuitive-00133628 - Intuitive-00133630)	403, 602, 701, 801, 802
518	02/17/2017 Presentation - "Remanufactured Instruments - Alignment" (Intuitive-00139149 - Intuitive-00139150)	106, 401, 402, 403, 602

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
519	01/03/2018 Wellstar re Medical Device Business Models (Intuitive-00141567 - Intuitive-00141568)	106, 403, 602, 701, 801, 802
520	01/08/2017 Document - Intuitive "Instrument Refurbishment Update" (Intuitive-00147262 - Intuitive-00147271)	106, 401, 402, 403, 602
521	01/20/2017 Email RE: FW: Instrument refurbishment update (Intuitive-00147369 - Intuitive-00147372)	106, 401, 402, 403
522	2017-07-06 - Email - Subject: "RE: Procedure Economics" (Intuitive-00147735 - Intuitive-00147736)	106, 403, 701
523	09/12/2019 Robotic Surgery - Competitive Landscape (Intuitive-00173706 - n/a)	106, 401, 402, 602, 801, 802
524	05/22/2017 "Unauthorized Instrument Reprogramming Overview" (Intuitive-00194074 - Intuitive-00194089)	106, 403, 602
525	2017-05-19 - SLSA - St. Mary's Duluth (Intuitive-00204014 - Intuitive-00204025)	106, 403, 602
526	2016-11-17 - E-mail - Re: Rebotix (Intuitive-02068990 - Intuitive-02068991)	106, 403, 602
527	2019-10-10 - ISRG to Panama City Surgery Center (Intuitive-00211776 - Intuitive-00211778)	106
528	2019-02-13 - Email "FW: Si service and Instrument reprocessing" (Intuitive-00214231 - Intuitive-00214234)	401, 402, 403, 801, 802
529	2019-02-13 - Email - Subject "re: Si service and instrument reprocessing" (Intuitive-00214241 - Intuitive-00214244)	106, 403, 801, 802
530	2019-08-15 - Email - Subject: "RE: Meeting Request regarding your daVinci Surgical System" (Intuitive-00214562 - Intuitive-00214564)	403, 602, 701, 801, 802, 703

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
531	08/23/2017 Document - Preparation for Industry Panel Discussion "Robotic Surgery: How Big of an Explosion is Coming?" (Intuitive-00231664 - Intuitive-00231667)	106, 403
532	08/01/2019 da Vinci SP Instruments and Accessories User Manual (Intuitive-00233189 - Intuitive-00233261)	
533	10/18/2018 Presentation - 2010 ISI Competitive Review - Overview (Intuitive-00234762 - Intuitive-00234838)	106, 403, 602, 801, 802
534	03/22/2017 Intuitive-00241336-Intuitive-00241370 (Intuitive-00241336 - Intuitive-00241370)	106, 401, 402, 602, 801, 802
535	03/22/2017 Agenda Overview - Nov 21, 2018 at intervals through Aug 5, 2019 (Intuitive-00246469 - Intuitive 00246491)	106, 403, 602, 702, 801, 802
536	03/22/2017 "Preparation for Industry Panel Discussion - 'Robotic Surgery: How Big of an Explosion is Coming?'" - (Intuitive-00269124 - Intuitive-00269126)	
537	05/23/2017 Instrument eX Update (Codename Dragon) (Intuitive-00273261 - Intuitive-00273294)	106, 401, 402, 403, 801, 802
538	05/24/2017 Presentation - Intuitive "Secondary Markets" (Intuitive-00273300 - Intuitive-00273330)	106, 401, 402, 403, 801, 802
539	2019-09-06 - Document - "Intuitive Surgical: What do the experts think about J&J's new surgical robot?" - Exhibit 8 of the Deposition of Bob DeSantis (Intuitive-00278203 - Intuitive-00278234)	106, 403, 602, 701, 801, 802, 703
540	2016-11 - Document - Intuitive "da Vinci Xi Surgical System Instruments and Accessories User Manual (PN 551457-10 Rev. B) (Intuitive-00284844 - Intuitive-00284945)	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
541	03/03/2014 Document - Intuitive "IS4000 Basic Instruments Worst Case Instrument Identification and Rationale (Attachment 1 to Doc. No. 861445-02T Rev. E)" (Intuitive-00290826 - Intuitive-00290831)	602, 801, 802
542	03/12/2014 Top Level Test Report for IS4000 8mm Basic Instruments (Intuitive-00290857 - Intuitive-00290883)	
543	09/15/2017 Presentation - Instruments & Accessories 2017 Strategic Offsite (Intuitive-00292544 - Intuitive-00292628)	401, 402, 403, 602, 801, 802
544	12/23/2016 SLSA - Piedmont Healthcare (Intuitive-00299311 - Intuitive-00299326)	
545	09/19/2018 Email - Subject: "RE: Si System End-of-Life Sales Leader Meeting Notes - 9/18/2018" (Intuitive-00331265 - Intuitive-00331266)	401, 402, 403
546	08/27/2019 Unauthorized Instrument Reprogramming Overview (Intuitive-00338790 - Intuitive-00338805)	602, 403
547	2014-05 - Document - Intuitive Surgical, "Endo Wrist/Single-Site Instrument & Accessory Catalog," (Intuitive-00360851 - Intuitive-00360889)	403
548	06/08/2017 Email - Subject: "US Scenarios and brainstorming" (Intuitive-00362750 - Intuitive-00362750)	106, 403, 602
549	06/08/2017 ISRG "Key Assumptions" and "Factors and Forces" (Intuitive-00362751 - Intuitive-00362756)	401, 402, 403, 602, 701, 801, 802
550	02/07/2018 Robotics Competition: Rhetoric in '18, Slight Impact in '19, with More in '20 (Intuitive-00364420 - Intuitive-00364444)	403, 602, 701, 702, 703, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
551	10/30/2019 Email - Subject: "FW: Quarterly Ops/Strategy Meeting, 15-16 October 2019 - Notes, Highlights, and Actions" (Intuitive-00366044 - Intuitive-00366053)	403, 602, 801, 802
552	02/16/2017 IS4000 Vessel Sealer Extend Product Requirements (Intuitive-00366687 - Intuitive-00366707)	403
553	2019-07-29 - Email - Subject: "RE: Collection & Refurbishment Pilot" (Intuitive-00369327 - Intuitive-00369347)	401, 402, 403, 801, 802
554	08/12/2019 Email - Subject: "RE: Rebotix Reprocessing Information of DaVinci Instrumentation" (Intuitive-00372699 - Intuitive-00372703)	602, 801, 802
555	10/15/2019 Document - Intuitive Cease and Desist Letter to Evergreen Healthcare (Intuitive-00372993 - Intuitive-00372995)	
556	2019-10-26 - ISRG Letter to Marin General Hospital (Intuitive-00373885 - Intuitive-00373887)	
557	05/31/2017 DaVinci X - Capability Meets Value (Intuitive-00389936 - Intuitive-00389950)	401, 402, 602, 801, 802
558	01/24/2017 Document - INTUITIVE SURGICAL PROPRIETARY RIGHTS AND NON-COMPETITION AGREEMENT (Intuitive-00423273 - Intuitive-00423279)	401, 402, 403, 602
559	01/30/2017 PowerPoint: Instrument eX: I&A Refurbishment Feasibility (Intuitive-00423534 - Intuitive-00423578)	401, 402, 403, 701, 703, 801, 802
560	11/11/2019 Powerpoint - Unauthorized Remanufactured Instruments Overview (Intuitive-00439333 - Intuitive-00439355)	403, 602, 801, 802
561	03/19/2020 Document - "Program Objective and Approach" - (Intuitive-00471993 - Intuitive-00471997)	602, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
562	11/15/2018 Document - Subject: "Tampering with. and Reprogramming da Vinci® Surgical System Instruments" (Intuitive-00478439 - Intuitive-00478444)	403
563	01/04/2002 Document - Intuitive letter response to FDA re: 510(k) Premarket Notification (K013416) Intuitive Surgical Endo Wrist Endoscopic Instruments (Intuitive-00481167 - Intuitive-00481175)	106, 602
564	06/01/2019 Is40000 Instruments and Accessories (Intuitive-00492204 - Intuitive-00492255)	
565	06/19/2023 IS4000 Surgical System - Traditional 510k - Section 18 Performance Testing (Intuitive-00493612 - Intuitive-00493670)	106, 602
566	11/15/2013 Document - Excerpts of K131861 AI Response (Intuitive-00506505 - Intuitive-00506641)	
567	03/27/2015 Small Clip Applier and Long Bipolar Forceps Instruments (Intuitive-00511898 - Intuitive-00511925)	106
568	2000-07-11 - Document - FDA Letter re Intuitive's K990114 510(k) Submission (Intuitive-00512045 - Intuitive-00512047)	106, 602
569	02/13/2006 Endowrist stabilizer system instructions (Intuitive-00520069 - Intuitive-00520084)	
570	2022-07-22 - Email - Subject "Rebotix Repair, LLC re Document Number CPT200126" (REBOTIX175839 - REBOTIX175843)	403, 602, 701, 703, 801, 802
571	10/02/2014 Document - Intuitive "Risk Benefit Analysis Frayed and Broken Tungsten Drive Cables, Pitch and Grip (Doc. No. 1016134 Rev. A)" (Intuitive-00536537 - Intuitive-0053654)	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
572	10/15/2009 Document - Intuitive "Reliability/Life Test Report for Mega SutureCut TM Needle Driver P/N 4x0309 (Doc. No. 822505-02R Rev. A)" (Intuitive-00542459 - Intuitive-00542461)	
573	09/29/2011 Presentation - Orion "IS4000 8mm Base Instruments CDR (PN 819005-03 Rev A)" (Intuitive-00542796 - Intuitive-00542919)	602, 801, 802
574	09/26/2013 Document - Intuitive "Protocol 862287-01P for Life Test Verification of IS1200 and IS2000/IS3000 Mega SutureCutTM Needle Driver P/N 420309 and 400309 and Large SutureCutTM Needle Driver P/N 400296 and 420296 (Doc. No. 862287-01P Rev. A)" (Intuitive-00544199 - Intuitive-00544214)	
575	02/18/2024 Document - Intuitive "Report for Reliability/Life Test of MSCND & LSCND Improvements for Grip Cable Life (Doc. No. 862287-01R Rev. A)" (Intuitive-00544494 - Intuitive-00544500)	
576	01/08/2015 Document - Intuitive "Protocol for Life Testing of Monopolar Curved Scissors (Doc. No. 822337-05P Rev. A)" (Intuitive-00546343 - Intuitive-00546379)	
577	09/11/2015 Report for Life Testing of IS4000 8MM Monopolar Curved Scissors (Intuitive-00546920 - Intuitive-00546929)	
578	822337-02P Rev. A LIFE TEST PROTOCOL FOR MCS INSTRUMENT PEEKIBONDED INVESTIGATION (Intuitive-00552471 - Intuitive-00552488)	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
579	07/08/2020 Excel - Intuitive "Extended Use Life-Testing Results (MCF-19-004 Life Extension project)" (Intuitive-00552535 - Intuitive-00552535)	
580	08/13/2020 Document - Intuitive "Non-Filing Justification for IS4000/IS4200 8mm Bipolar Cautery Instruments" (Intuitive-00552632 - Intuitive-00552651)	602
581	08/13/2020 Document - Intuitive "Non-filing Justification for IS4000 8mm Needle Drivers" (Intuitive-00552652 - Intuitive-00552664)	403
582	08/13/2020 Document - Intuitive "Non-Filing Justification for IS4000 8mm Forceps" (Intuitive-00552665 - Intuitive-00552681)	401, 402, 403
583	08/13/2020 Non-Filing Justification (NFJ) Product Family: IS4000 8mm GRASPERS AND RETRACTORS (Intuitive-00552682 - Intuitive-00552696)	602
584	08/18/2020 Document - Intuitive "Non-Filing Justification for IS4000/IS4200 8mm Bipolar Cautery Instruments" (Intuitive-00552697 - Intuitive-00552715)	
585	08/18/2020 Document - Intuitive "Non-Filing Justification for IS4000/IS4200 8mm Needle Drivers" (Intuitive-00552716 - Intuitive-00552727)	401, 402, 403, 602
586	08/18/2020 Document - Intuitive "Non-Filing Justification for IS4000/IS4200 8mm Forceps" (Intuitive-00552728 - Intuitive-00552743)	401, 402, 403, 602, 801, 802
587	2020-01-27 - Document - "New Self-Manufactured Competitive Risk; Downgrade to Hold" (Intuitive-00552993 - Intuitive-00553014)	106, 403, 602, 801, 802, 701, 702, 703
588	02/12/2020 Email - Subject: "FW: Goldman Initiation Report" (Intuitive-00553113 - Intuitive-00553114)	106, 403, 602, 701, 702, 703, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
589	02/12/2020 Email - Subject: "re: Instrument life extension - Bi-weekly Program update" (Intuitive-00556188 - Intuitive-00556190)	401, 402, 602, 801, 802
590	03/18/2020 Instrument Refurbishment Pilot (Intuitive-00556674 - Intuitive-00556675)	106, 602
591	08/16/2020 Document - "I,A,&E Portfolio Template" (Intuitive-00560277 - Intuitive-00560390)	106, 401, 402, 602
592	07/17/2020 2020-07-17 - Email - Subject: "Re: J&J Robot Delay - Market Move Today" (Intuitive-00560866 - Intuitive-00560866)	401, 402, 403
593	2020-02-12 - Email - Subject "re: LND - EP cable reliability results" (Intuitive-00560955 - Intuitive-00560956)	106, 401, 402, 602, 801, 802
594	2020-02-12 - Email RE: LND - EP Cable Reliability Results (Intuitive-00562853 - Intuitive-00562855)	
595	02/20/2020 Publication - Deutsche Bank "Deeper Dive on Third Party Risk to I&A Segment" Follow Up Research Report (Intuitive-00566055 - Intuitive-00566082)	403, 602, 701, 702, 703, 801, 802
596	2014-12-17 - SIS Invoice to Saint Francis re Stryker Forceps (Intuitive-00569180 - Intuitive-00569182)	
597	2020-05-14 - ISRG Letter to Lowell General Hospital re "refurbished" EndoWrist Instruments (Intuitive-00569308 - Intuitive-00569310)	
598	2019-08 - Presentation - Intuitive "Instrument Journey Mapping and Refurbishment Models" (Intuitive-00581814 - Intuitive-00581883)	106, 403, 602, 801, 802
599	2020-07 - Document - "Extended Use Program" mits of certain da Vinci X and Xi instruments (Intuitive-00583036 - Intuitive-00583043)	

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600	2020-09 - Presentation - Gen4 Instrument Refurbishment Pilot (Intuitive-00594883 - Intuitive-00594902)	401, 402, 403
601	04/23/2021 Document - BU Contribution Margins 2017-2020 (Intuitive-00595405 - n/a)	
602	1995-10-29 - Draft of 10/29/1995 Intuitive Surgical DevicesTM Business Overview Memorandum (Copy No. 26; Issued to Dave Rosa) (Intuitive-00595673 - Intuitive-00595694)	106, 401, 402, 403, 801, 802
603	08/22/2017 Email RE: "FW: SSM Project Management - August update" (Intuitive-00601672 - Intuitive-00601675)	401, 402, 403, 602
604	08/28/2017 Email - Subject: "RE: Weekly update on Dragon" (Intuitive-00602576 - Intuitive-00602578)	401, 402, 403, 602, 801, 802
605	06/21/2017 Instrument Remanufacturing (Project Dragon) - Program Update - Pilot Release (June 27, 2017) (Intuitive-00603241 - Intuitive-00603264)	106, 401, 402, 403, 801, 802
606	08/21/2017 Email - Subject: RE: Cost for Setting up "dragon" business and Att.: "US X&Xi Instrument Collection & Cleaning Cost Model 8.21.17.xlsx" (Intuitive-00603990 - Intuitive-00603992)	401, 402, 403
607	09/14/2017 Email - Intuitive internal from Katie Scoville to Dirk Barten - Subject: "RE: Dragon and Dragon Pilot Not Proceeding" (Intuitive-00604054 - Intuitive-00604055)	401, 402, 403, 602, 801, 802
608	04/11/2018 Email: RE "FW: Medline device collection - Central DuPage Hospital" (Intuitive-00604123 - Intuitive-00604123)	401, 402, 403, 602, 801, 802
609	04/20/2018 Email: RE "FW: Medline device collection - Central DuPage Hospital" (Intuitive-00604127 - Intuitive-00604127)	401, 402, 403, 602, 801, 802

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610	2016-08-14 Email re HCA Letter re Reprogramming.pdf (Intuitive-00614687 - Intuitive-00614688)	401, 402, 403, 801, 802
611	2020-03 - Presentation - Intuitive "Financial Impact of Reprocessing Cycle" (Intuitive-00624798 - Intuitive-00624805)	602
612	04/17/2020 Document - FDA letter K214095 to Intuitive Surgical requesting additional information re: da Vinci X/Xi (IS4200/IS4000) 8mm Reusable Instruments. (Intuitive-00625048 - Intuitive-00625143)	106, 403, 602
613	09/21/2020 Email - Re MCS Grip cable breaks (refurb project) (Intuitive-00626429 - Intuitive-00626434)	401, 402, 403, 602
614	2020-09 - Presentation - Intuitive "Gen4 Instrument Refurbishment Pilot" (Intuitive-00626597 - Intuitive-00626616)	106, 401, 402, 403, 602
615	2016-10-03 - Presentation - Intuitive "Core Instructions Project Review" (Intuitive-00642522 - Intuitive-00642585)	106, 401, 402, 403, 602
616	07/28/2017 Third Party Compatibility List, IS2000, IS3000 1009792-01-B (Intuitive-00645431 - n/a)	106, 401, 402, 403, 602
617	07/19/2019 EndoWrist Training Instruments and Accessories (Intuitive-00667503 - Intuitive-00667537)	106, 401, 402, 403, 602
618	2019-09-05 - PowerPoint - entitled "Core Instrument Strategy" dated September 05, 2019 (Intuitive-00671209 - Intuitive-00671220)	106, 602
619	11/05/2020 Intuitive Cost / Price Data (Intuitive-00686044 - n/a)	106, 403, 602
620	11/05/2020 Intuitive Product Cost Document (Intuitive-00686068 - n/a)	106, 403, 602
621	05/26/2021 Excel File - Instrument Complaints and RMAs (Intuitive-00695006 - Intuitive-00695006)	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
622	08/05/2021 Document - Intuitive "Manufacturing Process Instructions for General Cable Tensioning Method (Op. No. Dual Jaw 13)" (Intuitive-00705141 - Intuitive-00705142)	
623	02/25/2022 Document - FDA letter K214095 to Intuitive Surgical requesting additional information re: da Vinci X/Xi (IS4200/IS4000) 8mm Reusable Instruments. (Intuitive-00706002 - Intuitive-00706005)	
624	08/25/2017 Email - Subject: "DRAFT slides for Ops mtg" - re: Q317 Strategic Ops Readout Services (Intuitive-00785382 - Intuitive-00785382)	401, 402, 403, 602, 801, 802
625	09/01/2017 PowerPoint: da Vinci Surgery Services Update. (Intuitive-00786911 - Intuitive-00786951)	106, 401, 402, 403, 602, 801, 802
626	2016-09 - Document entitled "Managing the Long Tail of daVinci Si" (Intuitive-00795559 - Intuitive-00795610)	106, 401, 402, 403, 602, 701, 702, 703, 801, 802
627	06/21/2019 Citi Medical Devices Report (Intuitive-00808372 - Intuitive-00808551)	106, 403, 602, 701, 702, 703, 801, 802
628	10/21/2019 Email re instrument price reduction (Intuitive-00950949 - Intuitive-00950951)	602, 801, 802
629	02/04/2014 Email re instrument price reductions (Intuitive-00950952 - Intuitive-00950952)	401, 402, 403, 602, 801, 802
630	2014 PowerPoint:daVinci Procedure Optimization Program (Intuitive-00950953 - Intuitive-00950968)	401, 402, 403, 602, 801, 802
631	02/05/2014 "Dear Customer" letter re pricing (Intuitive-00950969 - Intuitive-00950970)	401, 402, 403, 602, 801, 802
632	02/12/2020 Email: RE: Instrument Life Extension (Intuitive-00952507 - Intuitive-00952508)	401, 402, 403, 602, 801, 802
633	07/21/2020 Email: Extended Use Program (Intuitive-00955977 - Intuitive-00955977)	602

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
634	03/21/2019 Email - Subject "RE: Skywalker Pre-Go Active debrief & next steps" (Intuitive-00967609 - Intuitive-00967613)	106, 401, 402, 801, 802
635	07/22/2019 Email - Subject: "re: Instrument Life Extension Update" - With Preliminary Weibull Analysis, Prograsp: 20 lives (+5 RCs); Cadiere: 18 lives (+5 RCs); MSCND: 18 lives (+5RCs) (Intuitive-00967951 - Intuitive-00967951)	
636	05/04/2020 Document - Intuitive Letter to St. Vincent's Hospital - "We understand that St. Vincent's Hospital is using "refurbished" EndoWrist® instruments, obtained from and/or modified by a third party for use beyond the programmed number of uses" (Intuitive-00980925 - Intuitive-00980927)	
637	02/14/2020 2020-02-14 - Document - Letter from Intuitive to Banner Health condemning the use of third party endowrists (Intuitive-00986535 - Intuitive-00986537)	
638	10/21/2019 Email - Subject: RE: Gamma Compatible RFID (Intuitive-00999771 - Intuitive-00999775)	401, 402, 403, 801, 802
639	05/23/2017 Email RE Instrument eX Update for Bob (Intuitive-01017711 - Intuitive-01017711)	401, 402, 403
640	05/23/2017 Instrument eX Update (Code Name: Dragon) (Intuitive-01017712 - Intuitive-01017714)	401, 402, 403
641	05/23/2017 Intuitive Surgical Secondary Markets (Intuitive-01017715 - Intuitive-01017745)	401, 402, 403
642	07/11/2017 Email Re: Lap Cost & Choreography Alignment (Intuitive-01018287 - Intuitive-01018292)	403, 801, 802

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643	05/07/2018 Email - Subject: reprogrammed instruments and Si portfolio (Intuitive-01019873 - Intuitive-01019873)	106, 602, 801, 802
644	05/10/2018 Email - Subject: "re: Instrument reprogramming in the US-engineering input needed" (Intuitive-01020015 - Intuitive-01020017)	401, 402, 403, 602, 801, 802
645	05/26/2017 Email - Buying Used Instruments off the Web (Intuitive-01024426 - Intuitive-01024427)	401, 402, 403, 602, 801, 802
646	01/19/2017 Email "FW: Instrument Refurbishment Update" (Intuitive-01084898 - Intuitive-01084901)	401, 402, 403, 602, 801, 802
647	01/21/2017 Market Analysis - Korea (Intuitive-01084908 - Intuitive-01084912)	106, 401, 402, 403
648	01/18/2017 PowerPoint - Japan (Intuitive-01084916 - Intuitive-01084919)	401, 402, 403, 602
649	07/12/2017 Presentation - Instrument Refurbishment (Project Dragon) (Intuitive-01085533 - Intuitive-01085555)	401, 402, 403; 602, 801, 802
650	06/12/2019 Email - Subject: "RE: Extended life project" (Intuitive-01085683 - Intuitive-01085685)	801, 802
651	2019-11 - Presentation - Intuitive "Instrument Security Analysis" (Intuitive-01107582 - Intuitive-01107587)	106, 801, 802
652	2021 - Document - Intuitive "da Vinci S and Si Reprocessing Instructions Appendices (PN 552268-03 Rev. A)" (Intuitive-01232035 - Intuitive-01232080)	106, 602
653	2021-04-19 - Powerpoint - "US Extended Use Program Round 2 - Program considerations and pricing" (Intuitive-01235518 - Intuitive-01235542)	106, 403, 602

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654	07/13/2022 Excel - Intuitive Expected Year-to-Year Growth Percentage Rate From FY 2020-2029 (Intuitive-01261766 - n/a)	401, 402, 602, 701, 702, 703, 801, 802
655	11/02/2021 Extended Uses Module (Intuitive-01263803 - Intuitive-1263829)	106, 401, 402, 403
656	10/20/1999 Sales Agreement - Pitt County (Intuitive-01291299 - Intuitive-01291327)	
657	12/21/2009 SLSA - Albany Medical Center (Intuitive-01376477 - Intuitive-01376492)	
658	02/28/2002 Sales and Service Agreement - St. Vincents (Intuitive-01525946 - Intuitive-01525964)	
659	07/01/1999 Sales Agreement - Ohio State University (Intuitive-01529190 - Intuitive-01529218)	
660	12/07/2018 Document - Sales, License, and Service Agreement (Intuitive-01807644 - Intuitive-01807658)	
661	2019-05-25 - SLSA - Franciscan Alliance (Intuitive-01846020 - Intuitive-01846034)	
662	2021-12-30 - Lease Agreement - Stanford (Intuitive-01989020 - Intuitive-01989038)	
663	08/26/1999 Sales Agreement - Herzzentrum Munich (Intuitive-02005416 - Intuitive-02005437)	401, 402, 403
664	03/08/1999 Service and Upgrade Agmt - Univ St. Pierre (Intuitive-02005898 - Intuitive-02005904)	401, 402, 403
665	12/27/2021 Intuitive Traditional 510(k) da Vinci X/Xi 8mm Instruments (Intuitive-02053646 - Intuitive-02053648)	106, 602
666	07/13/2022 Document - Intuitive's Performance Testing - Reliability Response. (Intuitive-02056740 - Intuitive-02056761)	106, 401, 402, 403, 602, 801, 802

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667	07/21/2022 Document - Intuitive "Response to FDA's February 25, 2022 Additional Information Request Regarding da Vinci X/Xi (IS4200/IS4000) 8mm Reusable Instruments (K214095)" (Intuitive-02066979 - Intuitive-02067059)	801, 802
668	10/17/2016 Email - Subject: "re: Refurbished Market analysis" (Intuitive-02068245 - Intuitive-02068245)	401, 402, 403, 602, 801, 802
669	2016-09 - Document - "Managing the Long Tail" (Intuitive-02068246 - Intuitive-02068297)	106, 602, 801, 802
670	05/24/2011 Email - Subject: RE: RFID Tag (Intuitive-02068686 - Intuitive-02068686)	401, 402, 403, 801, 802
671	05/25/2011 Email - Subject: RE RFID Meeting Action Items (Intuitive-02068695 - Intuitive-02068697)	401, 402, 403, 602, 801, 802
672	2012 Intuitive email chain reporting on company possibly performing EndoWrist refurbishment (Intuitive-02068700 - Intuitive-02068700)	401, 402, 403
673	10/23/2013 Email - Hacking of our Dallas chips to reuse instruments in Venezuela (Intuitive-02069303 - Intuitive-02069304)	401, 402, 403, 602, 801, 802
674	08/05/2016 Email - Fwd: - Tremendous Savings for HCA - Surgical Robot (Intuitive-02069573 - Intuitive-02069574)	401, 402, 403, 602, 801, 802
675	12/23/2021 Message - Subject "FDA Call" (Intuitive-02070398 - Intuitive-02070398)	
676	11/09/2022 Rebotix Settlement, November 8, 2022. (Intuitive-02070399 - Intuitive-02070405)	401, 402, 403, 602, 801, 802
677	01/23/2023 Restore Settlement, January 23, 2023. (Intuitive-02072151 - Intuitive-02072157)	401, 402, 403, 408
678	04/06/2022 Intuitive I&A Sales Data (Intuitive-02072162 - n/a)	

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679	04/06/2022 Intuitive Detail Sales Data (Intuitive-02072163 - n/a)	
680	07/07/2022 Intuitive I&A Sales Data (Intuitive-02072164 - n/a)	
681	07/07/2022 Intuitive I&A Sales Data (Intuitive-02072165 - n/a)	
682	10/06/2022 Intuitive I&A Sales Data (Intuitive-02072166 - n/a)	
683	10/06/2022 Intuitive I&A Sales Data (Intuitive-02072167 - n/a)	
684	Intuitive I&A Sales Data (Intuitive-02072168 - n/a)	
685	Intuitive I&A Sales Data (Intuitive-02072169 - n/a)	
686	Intuitive I&A Sales Data (Intuitive-02072170 - n/a)	
687	Intuitive I&A Sales Data (Intuitive-02072171 - n/a)	
688	Intuitive I&A Sales Data (Intuitive-02072172 - n/a)	
689	Intuitive I&A Sales Data (Intuitive-02072173 - n/a)	
690	Intuitive I&A Sales Data (Intuitive-02072174 - n/a)	
691	Intuitive I&A Sales Data (Intuitive-02072175 - n/a)	
692	Intuitive I&A Sales Data (Intuitive-02072176 - n/a)	
693	Intuitive I&A Sales Data (Intuitive-02072177 - n/a)	
694	Intuitive I&A Sales Data (Intuitive-02072178 - n/a)	
695	Intuitive I&A Sales Data (Intuitive-02072179 - n/a)	
696	Intuitive I&A Sales Data (Intuitive-02072180 - n/a)	
697	Intuitive I&A Sales Data (Intuitive-02072181 - n/a)	
698	Intuitive I&A Sales Data (Intuitive-02072182 - n/a)	
699	Intuitive I&A Sales Data (Intuitive-02072183 - n/a)	

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700	05/09/2024 Intuitive I&A Sales Data (Intuitive-02072184 - n/a)	
701	05/21/2024 Intuitive I&A Sales Data (Intuitive-02072185 - n/a)	
702	05/21/2024 Intuitive I&A Sales Data (Intuitive-02072186 - n/a)	
703	05/31/2024 Intuitive Procedures Data (Intuitive-02072187 - n/a)	
704	06/04/2024 IQVIA Procedures Data (Intuitive-02072188 - n/a)	
705	Intuitive I&A Sales Data (Intuitive-02072189 - n/a)	
706	Intuitive I&A Sales Data (Intuitive-02072190 - n/a)	
707	Intuitive I&A Sales Data (Intuitive-02072191 - n/a)	
708	06/12/2024 Intuitive I&A Sales Data (Intuitive-02072192 - n/a)	
709	06/17/2024 Intuitive I&A Sales Data (Intuitive-02072193 - n/a)	
710	08/07/2024 Supplementary I&A Files (Intuitive-02072194 - n/a)	
711	08/23/2024 Supplementary I&A Files (Intuitive-02072195 - n/a)	
712	08/23/2024 Supplementary System Files (Intuitive-02072196 - n/a)	
713	08/26/2024 Service Data (Intuitive-02072197 - n/a)	
714	Supplementary I&A Files (Intuitive-02072198 - n/a)	
715	Supplementary I&A Files (Intuitive-02072199 - n/a)	
716	03/29/2016 Ioannis D. Gkegkes, Ioannis A. Mamaia, and Christos lavazzo, "Robotics in general surgery: A systematic cost assessment." Journal of Minimal Access Surgery, Vol. 13, No. 4, 2017, 243-255	401, 402, 403, 602, 703, 801, 802

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717	11/15/2018 Isaac Ro, Veronika Dubajova, CFA, Akinori Ueda, Ph.D., Ziyi Chen, Jack O'Connell, Sara Silverman, and Frits Jonker, "Digital Health: Robotic Surgery and the OR of the Future," Goldman Sachs: Equity Research, November 15, 2018	403, 602, 701, 702, 703, 801, 802
718	ISO 13485:2016 - Quality Management System for Medical Devices	401, 402, 403, 602, 703, 801, 802
719	12/01/2006 J Laparoendosc Adv Surg Tech A. 2006 Dec;16(6):551-6	401, 402, 602, 703, 801, 802
720	Jack Curran, "Medical Equipment Repair & Maintenance Services," IB/SWorld, June 2020	401, 402, 403
721	Jason McGorman, "Intuitive Surgical Research," Bloomberg Intelligence, April 2019.	401, 402, 403, 602, 701, 801, 802
722	01/15/2009 Jaydeep H Palep, "Robotic assisted minimally invasive surgery," Journal of Minimal Access Surgery, Vol.5, No. I, January-March 2009	
723	John Hopkins Medicine, "Methods of Surgery,"	
724	08/13/2015 Johnson Memorial Health, "Recovery Benefits of Laparoscopic Surgery," August 2015	
725	2014 Jonathan E. Duchac, James M. Reeve, and Carl S. Warren, Financial and Managerial Accounting, Twelfth Edition, Mason, OH: South-Western Cengage Learning, 2014	403
726	Journal of The Society of Laparoscopic & Robotic Surgery, 2008	
727	12/15/2020 Jusuf Jamal, Abdulrahman M. Alshahrani, Jamal M. Arif, Feras M. Almarshad, "Robots in Cancer Surgery: A Boon or Bane," Journal of Cancer Therapy, Vol. 11, No. 12, December 2020, 803-823	
728	01/10/2002 K013416 510(k) Letter January 10, 2002, and Summary Sections II & III	

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729	08/15/2022 K214095 510(k) Letter August 15, 2022, Summary	
730	02/16/1999 K990144 510(k) (Intuitive-00512048 - Intuitive-00512158)	
731	11/26/1999 K990144 510(k) Volume 1 (Intuitive-00474672 - Intuitive-00474703)	401, 402, 403, 602, 801, 802
732	11/26/1999 K990144 510(k) Volume 2 (Intuitive-00474879 - Intuitive-00475057)	602, 801, 802
733	11/26/1999 K990144 510(k) Volume 3 (Intuitive-00474704 - Intuitive-00474793)	602, 801, 802
734	11/26/1999 K990144 510(k) Volume 4 (Intuitive-00475058 - Intuitive-00475299)	602, 801, 802
735	11/26/1999 K990144 510(k) Volume 5 (Intuitive-00475300 - Intuitive-00475680)	602, 801, 802
736	11/26/1999 K990144 510(k) Volume 6 (Intuitive-00475681 - Intuitive-00476188)	602, 801, 802
737	11/26/1999 K990144 510(k) Volume 7 (Intuitive-00474794 - Intuitive-00474878)	602, 801, 802
738	11/26/1999 K990144 510(k) Volume 7 (Intuitive-00694043 - Intuitive-00694521)	
739	2015 Katherine Levinson, "Robotic Assisted Surgery," Electrical and Computer Engineering Design Handbook, 2015.	
740	04/26/2019 Email Re: "Endowrists" (LARKIN-00000061 - LARKIN-00000062)	401, 402, 403, 602, 801, 802
741	02/25/2019 Email Re: "Intuitive Payment 500k" (LARKIN-00020971 - LARKIN-00020974)	106, 401, 402, 403, 602, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
742	10/01/2018 Mahdi Azizian, May Liu, Iman Khalaji, and Simon DiMaio, "Chapter I: The Da Vinci Surgical System," The Encyclopedia of Medical Robotics, Vol. I, October 2018	
743	06/13/2022 Malthias M. Aitzetmuller, et al., Robotic-Assisted Microsurgery and Its Future in Plastic Surgery, J. CLIN. MED. 2022, 11, 3378	403, 602, 703, 801, 802
744	Marcel Oomen, "Record High Growth in Surgical Procedures Triggers Upgrade of Guidance," Financiele Diensten Amsterdam, October 18, 2019, 1-4	401, 402, 403, 602, 701, 703, 801, 802
745	03/03/2020 Marion Webb, "Market Intel: Medtech Giants Read to Battle Frontrunner Intuitive Surgical in 'Soft Surgery Robotics,'" Pharma Intelligence, April 2020	403, 602, 703, 801, 802
746	05/28/1976 Medical Device Amendments of 1976 (90 Stat. 53)	
747	10/26/2002 Medical Device User Fee and Modernization Act of 2002 (116 Stat. 1588)	403, 703, 801, 802
748	MedStar Health, "Robotic Surgery"	
749	Midlands Clinic, "General Laparoscopic Procedures."	
750	11/23/2018 Moore, Eric J., "Robotic Surgery," Britannica (https://www.britannica.com/science/robotic-surgery)	403, 602, 703, 801, 802
751	MUSC Health, "Introduction to Laparoscopic Surgery" (hereafter	
752	National Health Service, "Laparoscopy (keyhole surgery)"	801, 802
753	Nicholas Economides, "Tying, bundling, and loyalty/requirement rebates," Research Handbook on the Economics of Antitrust Law, Einer Elhauge (Ed.), Edward Elgar, 2012	403, 703

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
754	07/13/2016 Patrick L Anderson et al., Robot-like Dexterity Without Computers and Motors: A Review of Hand-held Laparoscopic Instruments with Wrist-like Tip Articulation, EXPERT REVIEW OF MEDICAL DEVICES	403, 602, 703, 801, 802
755	11/01/2005 Phillips, PJ and Lynne, JC. 2005. Unnecessary 510(k) Filings: A Waste of FDA and Industry Resources. Regulatory Affairs Journal (Devices)	
756	07/05/1905 Pindyck & Rubinfeld (8th edition)	403, 701, 702, 703, 801, 802
757	05/20/2022 Plaintiff's Response to Intuitive's Interrogatory No. 1 (May 20, 2022)	403, 801, 802
758	05/20/2022 Plaintiff's Response to Intuitive's Interrogatory No. 2 (May 20, 2022)	403, 801, 802
759	08/08/2022 Plaintiff's Response to Intuitive's Interrogatory No. 5 (August 8, 2022)	403, 801, 802
760	02/09/2018 Pradeep P. Rao, "Robotic surgery: new robots and finally some real competition!," World Journal of Urology, Vol. 36, No. 4, April 2018 (hereafter "Rao") 537-541	403, 602, 703, 801, 802
761	06/30/1906 Pure Food and Drug Act of 1906 (34 Stat. 768, Ch. 3915)	401, 402
762	05/30/2019 Rafael E. Perez and Steven D. Schwartzberg, "Robotic surgery: finding a value in 2019 and beyond," Annals of Laparoscopic and Endoscopic Surgery, Vol. 4., May 30, 2019	403, 703, 801, 802
763	03/17/2014 Rebotix EndoWrist MDR Report (REBOTIX090153_001 - REBOTIX090260_001)	403, 602, 701, 702, 703, 801, 802
764	Data file (REBOTIX019132 - REBOTIX019209)	106, 401, 402, 602, 703, 801, 802

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765	10/30/2018 Document - Rebotix & Restore FAQ Responses (REBOTIX044230 - REBOTIX044236)	106, 602, 801, 802
766	10/13/2018 Document - Rebotix-Restore Distributor Agreement (REBOTIX050713 - REBOTIX050723)	
767	08/20/2019 Document - EndoWrists Service Process Flowchart (REBOTIX060986 - REBOTIX060989)	106, 602, 703, 801, 802
768	08/22/2019 Email - Subject: Agreement (REBOTIX061127 - REBOTIX061138)	
769	01/24/2020 Email - Subject: Fw: REB MEMORANDUM OF UNDERSTANDING (002) Att.: "REB MEMORANDUM OF UNDERSTANDING (002).docx" (REBOTIX067735 - REBOTIX067737)	
770	02/14/2020 Powerpoint: Use of the REBOTIX Responsible Reuse Process By Hospitals to Reduce Cost and Waste (REBOTIX068404 - REBOTIX068418)	106, 602, 703, 801, 802
771	02/21/2014 Email - Subject: Re: Life testing - Tissue media (REBOTIX075420 - REBOTIX075421)	602, 703, 801, 802
772	2014-02-16 - Email - Subject: Fwd: Wrist Cable Tension (REBOTIX075431 - REBOTIX075432)	602, 703, 801, 802
773	02/26/2014 Email - Subject: Re: Wrist Cable Tension (REBOTIX075433 - REBOTIX075435)	602, 703, 801, 802
774	03/18/2015 Email - FW: Emailing:summaryofprocess031815 (REBOTIX077469 - REBOTIX077473)	602, 703, 801, 802
775	07/09/2015 Email - Subject "Rebotix AI Letter Conference Call Follow-Up (REBOTIX077729_001 - REBOTIX077734_001)	
776	EndoWrist Disassembly and Salvage SOP (REBOTIX082680 - REBOTIX082682)	602, 703, 801, 802

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777	11/21/2014 Document - DQS Med "Final Report Technical File Review Acc. Sample Plan for Electrosurgical Endowrists (Reg. No. 516438 Rev. 2)" (REBOTIX083098 - REBOTIX083121)	602, 701, 703, 801, 802
778	2014-05-21 - Document - Rebotix "Document Approval Form (DCN 2014-009 Rev. A)" (REBOTIX084679_001 - REBOTIX084695_001)	403, 602, 701, 702, 703, 801, 802
779	2010-09 Document - DIN "German Standard Medical Instruments - Materials, Finish, and Testing (DIN 58298:2010-09)" (REBOTIX089137 - REBOTIX089155)	602, 703, 801, 802
780	2014-08-04 Document - Rebotix "MAUDE Sub Report" (REBOTIX089889 - REBOTIX089918)	403, 602, 701, 702, 703, 801, 802
781	10/14/2013 Document - IMR Test Labs "Analysis of Nonmetallic Components (Report No. 201310250A)" (REBOTIX092208 - REBOTIX092214)	602, 701, 703, 801, 802
782	2015/04 Document - REBOTIX™INTERCEPTOR CPLD Software Description (REBOTIX100995 - REBOTIX101019)	403, 602, 701, 702, 801, 802
783	2014-10-09 - Document - Rebotix "Product Specification: Rebotix Remanufactured EndoWrist REF420205 Fenestrated Bipolar Forceps (Doc. No. PS-PR420205 Rev. C)" (REBOTIX120669 - REBOTIX120697)	602, 701, 703, 801, 802; improper compilation of documents.
784	02/19/2015 PR3043 Incoming Evaluation SOP (REBOTIX121303 - REBOTIX121305)	403, 602, 701, 702, 801, 802
785	02/10/2016 Document - Rebotix "PR3050 Final Test (DCN. 2016-010 Rev. E)" (REBOTIX123447 - REBOTIX123449)	403, 602, 701, 702, 703, 801, 802

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786	12/22/2015 Document - Rebotix "Risk Management Plan Re-manufactured EndoWrists (Doc. No. RMPR1001 Rev. D) (REBOTIX123792_001 - REBOTIX123798_001)	403, 602, 701, 702, 703, 801, 802
787	2014-05-15 Document - Rebotix "OEM EndoWrist Wheel Torque Characterization Report, REF420093 (Doc. No. PR4005-093 Rev. A) (REBOTIX124900 - REBOTIX124923)	602, 703, 801, 802
788	08/19/2014 Document - SGS North America, Inc. "Module (1) EMC and Electrical Safety Testing (Report No. 3537245SF-001)" (REBOTIX128851 - REBOTIX128995)	602, 701, 703, 801, 802
789	02/19/2015 Document - Rebotix "Verification Protocol - Simulated Life Testing of Remanufactured EndoWrists 2nd Round (Doc. No. PR10450 Rev. A)" (REBOTIX132018 - REBOTIX132062)	403, 602, 701, 702, 703, 801, 802
790	02/19/2015 Rebotix Verification Protocol - Simulated Life Testing (REBOTIX132456 - REBOTIX132494)	602, 703, 801, 802
791	01/29/2015 Rebotix "Parts List and Test Forms" (REBOTIX132496 - REBOTIX132562)	602, 703, 801, 802
792	09/17/2014 Document - Rebotix "PR3024 Graspers and Drivers Aligning and Refurbishment SOP (DCN. 2014-028 Rev. C)" (REBOTIX133235 - REBOTIX133236)	403, 602, 701, 702, 703, 801, 802
793	2014-09-17 Document - Rebotix "PR3025 Scissors Sharpening and Refurbishment SOP (DCN. 2014-028 Rev. C)" (REBOTIX133237 - REBOTIX133238)	602, 703, 801, 802
794	9/17/2014 Document - Rebotix "PR3026 Tool End Surface Refinishing SOP (DCN, 2014-028 Rev. C)" (REBOTIX133239 - REBOTIX133240)	403, 602, 701, 702, 703, 801, 802

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795	2014-09-17 Document - Rebotix "PR3027 Housing Labeling SOP (DCN. 2014-045 Rev. D)" (REBOTIX133241 - REBOTIX133243)	602, 703, 801, 802
796	09/17/2014 Document - Rebotix "PR3028 Bi-Polar Pin Removal and Installation SOP (2014-028 Rev. B)" (REBOTIX133244 - REBOTIX133247)	602, 703, 801, 802
797	09/17/2014 Document - Rebotix "PR3029 Monopolar Plug Removal and Installation SOP (DCN. 2014-028 Rev. C)" (REBOTIX133248 - REBOTIX133252)	602, 703, 801, 802
798	09/17/2014 Document - Rebotix "PR3030 ESD (DCN. 2014-028 Rev. D)" (REBOTIX133253 - REBOTIX133255)	401, 402, 602, 703, 801, 802
799	09/17/2014 Document - Rebotix "PR3031 DS2505 Removal and Installation SOP (DCN. 2014-028 Rev. C)" (REBOTIX133256 - REBOTIX133258)	602, 703, 801, 802
800	09/17/2014 Document - Rebotix "PR3032 PCB Conformal Coating SOP (DCN. 2014-028 Rev. C)" (REBOTIX133259 - REBOTIX133260)	602, 703, 801, 802
801	09/17/2014 Document - Rebotix "PR3033 EndoWrist Disassembly and Salvage SOP (DCN. 2014-028 Rev. C)" (REBOTIX133261 - REBOTIX133265)	602, 703, 801, 802
802	2014-09-17 - Document - Rebotix "PR3034 Autoclave Sterilization SOP (DCN. 2014-028 Rev. E)" (REBOTIX133266 - REBOTIX133271)	602, 703, 801, 802
803	2014-09-17 - Document - Rebotix "PR3035 Incoming Ultrasonic Cleaning and Flush SOP (DCN. 2014-028 Rev. E)" (REBOTIX133272 - REBOTIX133278)	403, 602, 701, 702, 703, 801, 802

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804	09/17/2014 Document - Rebotix "PR3036 In-Process Ultrasonic Cleaning SOP (DCN. 2014-028 Rev. C)" (REBOTIX133279 - REBOTIX133280)	403, 602, 701, 702, 703, 801, 802
805	09/17/2014 Document - Rebotix "PR3037 Testing Gripping Efficiency of EndoWrist Needle Drivers and Forceps SOP (DCN. 2014-028 Rev. B)" (REBOTIX133281 - REBOTIX133282)	602, 703, 801, 802
806	09/17/2014 Document - Rebotix "PR3038 Testing the Cutting Efficiency of Endo Wrist Scissors SOP (DCN. 2014-028 Rev. B)" (REBOTIX133283 - REBOTIX133284)	602, 703, 801, 802
807	09/17/2014 Document - Rebotix "PR3039 Testing Degrees of Freedom Using Optical Comparator SOP (DCN. 2014-028 Rev. B)" (REBOTIX133285 - REBOTIX133289)	602, 703, 801, 802
808	03/31/2014 Document - Rebotix "PR3040 Operation of DaVinci S Surgical System (DCN. 2014-003 Rev. B)" (REBOTIX133290 - REBOTIX133294)	602, 703, 801, 802
809	2014-09-17 - Document - Rebotix "PR3041 Dielectric Testing SOP (DCN. 2014-034 Rev. E)" (REBOTIX133295 - REBOTIX133300)	602, 703, 801, 802
810	09/17/2014 Document - Rebotix "PR3042 Continuity Testing SOP (DCN. 2014-028 Rev. E)" (REBOTIX133301 - REBOTIX133304)	602, 703, 801, 802
811	09/17/2014 Document - Rebotix "PR3043 Incoming Evaluation SOP (DCN. 2014-028 Rev. D)" (REBOTIX133305 - REBOTIX133308)	602, 703, 801, 802
812	09/17/2014 Document - Rebotix "PR3044 Final Assembly SOP (DCN. 2014-028 Rev. D)" (REBOTIX133309 - REBOTIX133311)	602, 703, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
813	09/17/2014 Document - Rebotix "PR3047 Test Form (DCN. 2014-028 Rev. E)" (REBOTIX133337 - REBOTIX133338)	602, 703, 801, 802
814	10/27/2014 Document - Rebotix "PR3048 Process Flow Chart (DCN. 2014-041 Rev. D)" (REBOTIX133339 - REBOTIX133340)	602, 703, 801, 802
815	09/22/2014 - Document - Rebotix "PR3050 Final Test (DCN. 2014-035 Rev. C)" (REBOTIX133341 - REBOTIX133343)	602, 703, 801, 802
816	09/17/2014 - Document - Rebotix "PR3052 Spool Torque SOP (DCN. 2014-028 Rev. C)" (REBOTIX133344 - REBOTIX133349)	403, 602, 701, 702, 703, 801, 802
817	10/27/2014 Document - Rebotix "PR3059 Box Labeling SOP (DCN. 2014-037 Rev. A)" (REBOTIX133350 - REBOTIX133353)	602, 703, 801, 802
818	01/08/2015 - Document - Rebotix "Design Development Plan "Endowrist" DPPR1001 (DCN. 2014-009 Rev. C)" (REBOTIX133361 - REBOTIX133373)	602, 703, 801, 802
819	09/15/2014 2014-09-15 - Document - Rebotix "PR3041 Dielectric Testing SP (DCN. 2014-034 Rev. E)" (REBOTIX134654 - REBOTIX134659)	602, 703, 801, 802
820	09/15/2014 Rebotix Dielectric Testing SOP (REBOTIX134654 - REBOTIX134659)	602, 703, 801, 802
821	05/08/2014 Document - Rebotix "PR3039 Testing Range of Motion Using Optical Comparator SOP (DCN. 2014-007 Rev A)" (REBOTIX134750 - REBOTIX134754)	602, 703, 801, 802
822	10/09/2014 Mechanical Verification Protocol, EndoWrist (REBOTIX138033 - REBOTIX138042)	602, 703, 801, 802
823	05/21/2014 Life Test Worst Case Model Analysis (REBOTIX146770_001 - REBOTIX146781_001)	403, 602, 701, 702, 703, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
824	06/25/2020 Email - Subject "Request for More Information on Rebotix Repair Repairing/Servicing Activities" (REBOTIX146948_001 - REBOTIX146955_001)	
825	DS2505 - 16Kb Add-Only Memory (REBOTIX148555 - REBOTIX148578)	602, 801, 802
826	05/14/2014 Thera-Band Red Product Release (REBOTIX153047 - REBOTIX153047)	403, 602, 801, 802
827	Rebotix Module 6: Assembly (REBOTIX160706 - REBOTIX160707)	106, 602, 703, 801, 802
828	Document - Rebotix "Executive Summary for EndoWrist Repair Service" (REBOTIX162185 - REBOTIX162189)	602, 703, 801, 802
829	07/10/2018 Document - Rebotix Draft "Distributor Agreement Terms and Conditions" (REBOTIX162208 - REBOTIX162212)	602, 703, 801, 802
830	04/25/2019 EndoWrist Service Procedure (REBOTIX162425 - REBOTIX162445)	602, 703, 801, 802
831	04/08/2021 Document - Rebotix "Sales by Customer Detail" (REBOTIX165979 - REBOTIX165998)	602, 703, 801, 802
832	12/14/2014 Document - Rebotix "'Module (J) Performance Data' Simulated Life Testing on Remanufactured EndoWrists" (REBOTIX170053 - REBOTIX170420)	
833	06/23/2015 Email - From FDA to Ryan Burke - Subject "K143619/S002 is on hold pending your response" (REBOTIX171058 - REBOTIX171058)	106
834	03/06/2020 REBOTIX171224 - REBOTIX171226 - E-mail correspondence between FDA and Rebotix, starting February 28, 2020 (REBOTIX171224 - REBOTIX171226)	403, 602, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
835	02/27/2020 Document - Timeline of Rebotix history repairing EndoWrists (REBOTIX174692 - REBOTIX174696)	106, 403, 602, 701, 703, 801, 802
836	Rebotix EndoWrist Demonstration Video [Native Document Placeholder] (REBOTIX175327 - REBOTIX175327)	
837	01/13/2022 Document - Letter from Stan Hamilton to FDA re CPT2000126 (REBOTIX175468 - REBOTIX175470)	106, 401, 402, 403, 602, 702, 801, 802
838	11/13/2018 Restore Return Goods Authorization (Restore-00001424 - Restore-00001439)	403, 602, 701, 703, 801, 802
839	10/17/2018 Email - Subject: FW: Signed agreement (Restore-00027409 - Restore-00027420)	401, 402, 403, 602, 801, 802
840	09/17/2019 Email - FW:3x robotic inst (Restore-00030379 - Restore-00030384)	403, 602, 701, 801, 802, 703
841	06/30/2022 Email - re Iconocare Deficiency Notice (Restore-00086093 - Restore-00086120)	602, 801, 802
842	05/27/2021 SOP-0058 - Innovative Health - Robotic Surgical Instrument Refurbishing (Restore-00089490 - Restore-00089503)	106, 401, 402, 602, 801, 802
843	08/04/2022 Email K210478/5001 is on Hold Pending Your Response (Restore-00112674 - Restore-00112705)	602, 801, 802
844	Riccardo Autorino, MD, PhD, FEBU, "Robotic Surgical Systems in Urology: What's in the Pipeline?," Grand Rounds in Urology, February 7, 2018	401, 402, 403, 602, 701 703, 801, 802
845	01/01/2001 Richard A. Posner, Antitrust Law. Second Edition, Chicago, IL: The University of Chicago Press, 2001	403, 701, 702, 703, 801, 802
846	01/01/2008 Richard G. Budynas and J. Keith Nisbett, Shigley's Mechanical Engineering Design, Ninth Edition, McGrawHill, New York, 2008, Chapter 7	403, 602, 702, 801, 802, 703
847	Rob Surgical, "Top 5 Trends in the Robotic Surgery Market."	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
848	01/01/2013 Robert S. Pindyck and Daniel L. Rubinfield, Microeconomics, Eighth Edition, Upper Saddle River, New Jersey: Pearson Education, 2013 (hereafter "Pindyck & Rubinfield (8th edition)")	403, 701, 702, 703, 801, 802
849	01/06/2010 Ruurda, Jelle P., et al. "Analysis of Procedure Time in Robot-Assisted Surgery: Comparative Study in Laparoscopic Cholecystectomy."	602, 703, 801, 802
850	11/28/1990 Safe Medical Devices Act of 1990 (104 Stat. 4511)	403, 703
851	05/27/2020 Sally Kathryn Longmore, Ganesh Naik, and Gaetano D. Gargiulo, "Laparoscopic Robotic Surgery: Current Perspective and Future Directions," Robotics, Vol. 2, No. 9, 2020	401, 402, 403, 602, 703, 801, 802
852	Schedule 1.0. Note: The Lanham Act damages represent Intuitive's sales	403, 801, 802
853	01/01/1999 Scheer, Adena, et al. "Laparoscopic Colon Surgery: Does Operative Time Matter?"	401, 402, 602, 703, 801, 802
854	01/01/2009 Scheer, Adena, et al. "Laparoscopic Colon Surgery: Does Operative Time Matter?" Diseases of the Colon & Rectum, vol. 52, no. 10, 2009	401, 402, 602, 703, 801, 802
855	Bero Second Rebuttal Schedule 13.0	403, 801, 802
856	01/10/2010 Sheetz at al., Trends in the Adoption of Robotic Surgery for Common Surgical Procedures, Journal of American Medicine, Jan. 10, 2020	403, 602, 702, 801, 802, 703
857	06/21/1905 Shushan A, Mohamed H, Magos AL. How long does laparoscopic surgery really take? Lessons learned from 1000 operative laparoscopies	401, 402, 602, 703, 801, 802
858	SIS "About Us" webpage, available at https://sis-usa.com/about/	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
859	2019-08-22 - Document - Contract between Rebotix and Surgical Instrument Service Company, Inc (SIS000035 - SIS000045)	106
860	08/22/2019 Document - Contract (Distributor Agreement) between Rebotix and Surgical Instrument Service Company, Inc (SIS000046 - SIS000046)	106
861	2019-09-15 - Document - Amendment to September 1, 2016 Agreement No. MS4788 (Vizient & SIS) (SIS000047 - SIS000049)	
862	Document - SIS Da Vinci Customer Repair Sheet (SIS000171 - SIS000172)	
863	10/10/2019 Presentation - Banner Health "Cost Savings Initiative SIS - Si EndoWrist Repair Program" (SIS001621 - SIS001629)	602, 801, 802
864	06/02/2020 Presentation - SIS "Driving Down Costs" (SIS003653 - SIS003670)	602, 801, 802
865	2021/01 Presentation - SIS "Robotic EndoWrist Inspection and Recovery Program" (SIS003902 - SIS003903)	403, 602, 701, 703, 801, 802
866	10/10/2019 Presentation - Banner Health "Cost Savings Initiative SIS - Si EndoWrist Repair Program" (SIS009443 - SIS009449)	602, 701, 703, 801, 802
867	05/24/2021 Document - SIS "EndoWrist Inspection and Recovery" (SIS010151 - SIS010151)	
868	2021-06-01 - Document - Amendment to August 1, 2020 Agreement No. SV2345 (Vizient & SIS) (SIS045231 - SIS045232)	
869	2019-09-15 - Document - Amendment to September 1, 2016 Agreement No. MS4788 (Vizient & SIS) (SIS047433 - SIS047435)	
870	2021-10-08 - Document - Amendment to August 1, 2020 Agreement No. SV2345 (Vizient & SIS) (SIS075744 - SIS075746)	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
871	08/27/2019 Presentation - SIS & Vizient "da Vinci EndoWrist Service Program" (SIS106493 - SIS106498)	106, 602, 701, 801, 802, 703
872	2020-11-15 - Document - Amendment to August 1, 2020 Agreement No. SV2345 (Vizient & SIS) (SIS116933 - SIS116940)	
873	2022-02-01 - Document - Agreement (Yankee Alliance & SIS) (SIS163317 - SIS163341)	
874	2020-08-01 - Document - Supplier Services Agreement No. SV2345 for Third Party Instrument and Scope Repair (Vizient & SIS) (SIS169233 - SIS169280)	
875	2012-11-01 - Document - Agreement (Yankee Alliance & SIS) (SIS319315 - SIS319322)	401, 402, 403
876	2016-09-01 - Document - Supplier Services Agreement No. MS4788 for Instrument Repair (Vizient & SIS) (SIS330591 - SIS330634)	
877	09/17/2021 Presentation - SIS & Vizient (SIS343965 - SIS343971)	
878	11/30/2022 SIS356504 (SIS356504 - SIS356505)	
879	2014 - Document - Atmel "CryptoRF EEPROM Memory Full Specification" (SIS357309 - SIS357468)	801, 802
880	05/16/2019 Document - Intuitive "da Vinci X System User Manual" (SIS357469 - SIS357812)	
881	Document - SIS Photos of Endoscope Cables (SIS357887 - SIS357893)	401, 402, 403, 602, 701, 702, 703
882	Stanford Health Care, "General Surgery Types"	
883	02/14/2020 Stress Engineering Services, Inc, 14 Feb. 2020	106, 401, 402, 403, 602, 801, 802
884	01/01/2015 Stryker Robotics Opportunities Financial Analysis (STRREB00001810 - n/a)	

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
885	01/01/2015 Stryker Financial Model for Raptor Deal (STRREB00001827 - n/a)	
886	11/02/2011 Surg Endosc. 2012 Apr;26(4):956-63. Epub 2011 Nov 2	403, 602, 702, 801, 802, 703
887	08/31/2012 Surg Endosc. 2012 Oct;26(10):2711-6. Epub 2012 Aug 31	403, 602, 702, 801, 802, 703
888	04/25/2017 Text of Medical Device Servicing Safety and Accountability Act (H. R. 2118)	401, 402, 403
889	10/01/2022 The Business Research Company, "Robotic Surgery Devices Global Market Report 2022 - By Product And Service (Robotic Systems, Instruments & Accessories, Services), By Surgery Type (Urological Surgery, Gynecological Surgery, Orthopedic Surgery, Neurosurgery, Other Surgery Types), By End User (Hospitals, Ambulatory Surgery Centers) - Market Size, Trends, And Global Forecast 2022-2026," October 2022	RESERVED: Document produced is a description of the document, not the document itself. As to the description, Intuitive objects pursuant to FRE 106, 401, 402, 403, 602, 701, 702, 703, 801, 802, and 901.
890	The Comprehensive Guide to Economic Damages: Volume One at 239 (2020 6th ed., BVR Publications)	106, 401, 402, 403, 801, 802
891	05/01/2018 The Significant Amendments to the FDC Act report, published by FDA in May, 2018	RESERVED. Document requested but not produced. Defendant provisionally objects pursuant to FRE 106, 401, 402, 403, 602, 701, 702, 703, 801, 802
892	Tim Lane, "A short history of robotic surgery," Annals of the Royal College of Surgeons of England, 2018	401, 402, 403, 602, 702, 801, 802, 703
893	10/27/2016 Transcription of the FDA October 27, 2016 Workshop on Refurbishing, Reconditioning, Rebuilding, Remarketing, Remanufacturing, and Services of Medical Devices	401, 402, 403, 801, 802, 901
894	10/13/2017 TransEnterix K171120 dated October 13, 2017	401, 402, 403
895	05/25/2018 TransEnterix K180163 dated May 25, 2018	401, 402, 403

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
896	10/09/2018 TransEnterix K181517 dated October 9, 2018	401, 402, 403
897	12/06/2018 TransEnterix K183098 dated December 6, 2018	401, 402, 403
898	11/22/2019 TransEnterix K192877 dated November 22, 2019	401, 402, 403
899	07/16/1905 TransEnterix, Inc. Fact Sheet: Senhance Surgical System Highlights	
900	06/24/2021 U.S. Food and Drug Administration, "Remanufacturing of Medical Devices -- Draft Guidance for Industry and Food and Drug Administration Staff", June 24, 2021	
901	01/01/2024 U.S. Food and Drug Administration, "'Off-Label' and Investigational Use of Marketed Drugs, Biologics, and Medical Devices" (1998)	401, 402, 403, 901
902	03/27/1984 U.S. Supreme Court, Jefferson Parish Hospital District No. 2 et al. v. Hyde, 466 U.S., No. 82-1031, March 27, 1984	403, 703
903	UC Health, "About the daVinci Surgical System"	801, 802
904	UC Health; SotMedica, "DaVinci Surgical System."	801, 802
905	UCLA Health, "About Robotic Surgery at UCLA."	801, 802
906	06/25/2015 United States Department of Justice, Competition and Monopoly: SingleFirm Conduct Under Section 2 of the Sherman Act, 2008	403, 703
907	05/13/2019 United States District Court for the Northern District of Florida, Restore Robotics LLC and Restore Robotics Repair LLC v. Intuitive Surgical, Inc., No. 5: I 9-cv-00055-MCR-MJF, First Amended Complaint, May 13, 2019	401, 402, 403, 404(b), 602, 701, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
908	08/11/1998 US Patent No. 5,792,135, for an "Articulated surgical instrument for performing minimally invasive surgery with enhanced dexterity and sensitivity"	
909	Web archive of the Da Vinci Instruments page of Intuitive's website, retrieved on May 2, 2023	
910	01/01/2018 William E. Kelley, "The Evolution of Laparoscopy and the Revolution in Surgery in the Decade of the 1990s,"	401, 402, 403, 602, 703, 801, 802
911	www.vizient.com	403, 602, 703, 801, 802
912	01/01/2023 X&Xi Instrument Collection & Cleaning Cost Model 25 8.21.17.xls.	401, 402, 403
913	01/01/2018 Zheng Wang, Sicong Liu, Jing Peng, and Michael Zhiqiang Chen, "The Next Generation Surgical Robots," Intech Open, 2017	403, 602, 703, 801, 802
914	12/02/2022 Compilation of Damages Schedules - Bero Opening	403, 801, 802
915	02/25/2023 Compilation of Damages Schedules - Bero Rebuttal	403, 801, 802
916	03/01/2023 Compilation of Damages Schedules - Bero Second Rebuttal	403, 801, 802
917	10/25/2024 Compilation of Damages Schedules - Bero Second Rebuttal - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
914.001	12/02/2022 Bero Opening Schedule 1.0	403, 801, 802
914.002	12/02/2022 Bero Opening Schedule 2.0	403, 801, 802
914.003	12/02/2022 Bero Opening Schedule 2.1	403, 801, 802
914.004	12/02/2022 Bero Opening Schedule 2.2	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
914.005	12/02/2022 Bero Opening Schedule 3.0	403, 801, 802
914.006	12/02/2022 Bero Opening Schedule 3.1	403, 801, 802
914.007	12/02/2022 Bero Opening Schedule 4.0	403, 801, 802
914.008	12/02/2022 Bero Opening Schedule 4.1	403, 801, 802
914.009	12/02/2022 Bero Opening Schedule 4.2	403, 801, 802
914.010	12/02/2022 Bero Opening Schedule 4.3	403, 801, 802
914.011	12/02/2022 Bero Opening Schedule 4.4	403, 801, 802
914.012	12/02/2022 Bero Opening Schedule 4.5	403, 801, 802
914.013	12/02/2022 Bero Opening Schedule 5.0	403, 801, 802
914.014	12/02/2022 Bero Opening Schedule 5.1	403, 801, 802
914.015	12/02/2022 Bero Opening Schedule 5.2	403, 801, 802
914.016	12/02/2022 Bero Opening Schedule 5.3	403, 801, 802
914.017	12/02/2022 Bero Opening Schedule 6.0	403, 801, 802
914.018	12/02/2022 Bero Opening Schedule 7.0	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
914.019	12/02/2022 Bero Opening Schedule 8.0	403, 801, 802
914.020	12/02/2022 Bero Opening Schedule 8.1	403, 801, 802
914.021	12/02/2022 Bero Opening Schedule 8.2	403, 801, 802
914.022	12/02/2022 Bero Opening Schedule 9.0	403, 801, 802
914.023	12/02/2022 Bero Opening Schedule 9.1	403, 801, 802
914.024	12/02/2022 Bero Opening Schedule 10.0	403, 801, 802
914.025	12/02/2022 Bero Opening Schedule 10.1	403, 801, 802
914.026	12/02/2022 Bero Opening Schedule 11.0	403, 801, 802
914.027	12/02/2022 Bero Opening Schedule 11.1	403, 801, 802
914.028	12/02/2022 Bero Opening Schedule 11.2	403, 801, 802
914.029	12/02/2022 Bero Opening Schedule 12.0	403, 801, 802
914.030	12/02/2022 Bero Opening Schedule 12.1	403, 801, 802
914.031	12/02/2022 Bero Opening Schedule 12.2	403, 801, 802
914.032	12/02/2022 Bero Opening Schedule 13.0	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
914.033	12/02/2022 Bero Opening Schedule 13.1	403, 801, 802
914.034	12/02/2022 Bero Opening Schedule 13.2	403, 801, 802
914.035	12/02/2022 Bero Opening Schedule 14.0	403, 801, 802
914.036	12/02/2022 Bero Opening Schedule 15.0	403, 801, 802
914.037	12/02/2022 Bero Opening Schedule 15.1	403, 801, 802
914.038	12/02/2022 Bero Opening Schedule 16.0	403, 801, 802
914.039	12/02/2022 Bero Opening Schedule 16.1	403, 801, 802
914.040	12/02/2022 Bero Opening Schedule 16.2	403, 801, 802
915.001	02/25/2023 Bero Updated Schedule 1.0	403, 801, 802
915.002	02/25/2023 Bero Updated Schedule 2.0	403, 801, 802
915.003	02/25/2023 Bero Updated Schedule 2.1	403, 801, 802
915.004	02/25/2023 Bero Updated Schedule 2.2	403, 801, 802
915.005	02/25/2023 Bero Updated Schedule 3.0	403, 801, 802
915.006	02/25/2023 Bero Updated Schedule 3.1	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
915.007	02/25/2023 Bero Updated Schedule 4.0	403, 801, 802
915.008	02/25/2023 Bero Updated Schedule 4.1	403, 801, 802
915.009	02/25/2023 Bero Updated Schedule 4.2	403, 801, 802
915.010	02/25/2023 Bero Updated Schedule 4.3	403, 801, 802
915.011	02/25/2023 Bero Updated Schedule 4.4	403, 801, 802
915.012	02/25/2023 Bero Updated Schedule 4.5	403, 801, 802
915.013	02/25/2023 Bero Updated Schedule 5.0	403, 801, 802
915.014	02/25/2023 Bero Updated Schedule 5.1	403, 801, 802
915.015	02/25/2023 Bero Updated Schedule 5.2	403, 801, 802
915.016	02/25/2023 Bero Updated Schedule 5.3	403, 801, 802
915.017	02/25/2023 Bero Opening Schedule 6.0	403, 801, 802
915.018	02/25/2023 Bero Opening Schedule 7.0	403, 801, 802
915.019	02/25/2023 Bero Opening Schedule 8.0	403, 801, 802
915.020	02/25/2023 Bero Opening Schedule 8.1	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
915.021	02/25/2023 Bero Opening Schedule 8.2	403, 801, 802
915.022	02/25/2023 Bero Opening Schedule 9.0	403, 801, 802
915.023	02/25/2023 Bero Opening Schedule 9.1	403, 801, 802
915.024	02/25/2023 Bero Opening Schedule 10.0	403, 801, 802
915.025	02/25/2023 Bero Opening Schedule 10.1	403, 801, 802
915.026	02/25/2023 Bero Opening Schedule 11.0	403, 801, 802
915.027	02/25/2023 Bero Opening Schedule 11.1	403, 801, 802
915.028	02/25/2023 Bero Opening Schedule 11.2	403, 801, 802
915.029	02/25/2023 Bero Opening Schedule 12.0	403, 801, 802
915.030	02/25/2023 Bero Opening Schedule 12.1	403, 801, 802
915.031	02/25/2023 Bero Opening Schedule 12.2	403, 801, 802
915.032	02/25/2023 Bero Opening Schedule 13.0	403, 801, 802
915.033	02/25/2023 Bero Opening Schedule 13.1	403, 801, 802
915.034	02/25/2023 Bero Opening Schedule 13.2	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
915.035	02/25/2023 Bero Opening Schedule 14.0	403, 801, 802
915.036	02/25/2023 Bero Opening Schedule 15.0	403, 801, 802
915.037	02/25/2023 Bero Opening Schedule 15.1	403, 801, 802
915.038	02/25/2023 Bero Updated Schedule 16.0	403, 801, 802
915.039	02/25/2023 Bero Updated Schedule 16.1	403, 801, 802
915.040	02/25/2023 Bero Updated Schedule 16.2	403, 801, 802
916.001	03/01/2023 Bero Second Rebuttal Schedule 1.0	403, 801, 802
916.002	03/01/2023 Bero Second Rebuttal Schedule 2.0	403, 801, 802
916.003	03/01/2023 Bero Second Rebuttal Schedule 2.1	403, 801, 802
916.004	03/01/2023 Bero Second Rebuttal Schedule 2.2	403, 801, 802
916.005	03/01/2023 Bero Second Rebuttal Schedule 3.0	403, 801, 802
916.006	03/01/2023 Bero Second Rebuttal Schedule 3.1	403, 801, 802
916.007	03/01/2023 Bero Second Rebuttal Schedule 4.0	403, 801, 802
916.008	03/01/2023 Bero Second Rebuttal Schedule 4.1	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
916.009	03/01/2023 Bero Second Rebuttal Schedule 4.2	403, 801, 802
916.010	03/01/2023 Bero Second Rebuttal Schedule 4.3	403, 801, 802
916.011	03/01/2023 Bero Second Rebuttal Schedule 4.4	403, 801, 802
916.012	03/01/2023 Bero Second Rebuttal Schedule 4.5	403, 801, 802
916.013	03/01/2023 Bero Second Rebuttal Schedule 5.0	403, 801, 802
916.014	03/01/2023 Bero Second Rebuttal Schedule 5.1	403, 801, 802
916.015	03/01/2023 Bero Second Rebuttal Schedule 5.2	403, 801, 802
916.016	03/01/2023 Bero Second Rebuttal Schedule 5.3	403, 801, 802
916.017	03/01/2023 Bero Second Rebuttal Schedule 6.0	403, 801, 802
916.018	03/01/2023 Bero Second Rebuttal Schedule 7.0	403, 801, 802
916.019	03/01/2023 Bero Second Rebuttal Schedule 8.0	403, 801, 802
916.020	03/01/2023 Bero Second Rebuttal Schedule 8.1	403, 801, 802
916.021	03/01/2023 Bero Second Rebuttal Schedule 8.2	403, 801, 802
916.022	03/01/2023 Bero Second Rebuttal Schedule 9.0	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
916.023	03/01/2023 Bero Second Rebuttal Schedule 9.1	403, 801, 802
916.024	03/01/2023 Bero Second Rebuttal Schedule 10.0	403, 801, 802
916.025	03/01/2023 Bero Second Rebuttal Schedule 10.1	403, 801, 802
916.026	03/01/2023 Bero Second Rebuttal Schedule 11.0	403, 801, 802
916.027	03/01/2023 Bero Second Rebuttal Schedule 11.1	403, 801, 802
916.028	03/01/2023 Bero Second Rebuttal Schedule 11.2	403, 801, 802
916.029	03/01/2023 Bero Second Rebuttal Schedule 12.0	403, 801, 802
916.030	03/01/2023 Bero Second Rebuttal Schedule 12.1	403, 801, 802
916.031	03/01/2023 Bero Second Rebuttal Schedule 12.2	403, 801, 802
916.032	03/01/2023 Bero Second Rebuttal Schedule 13.0	403, 801, 802
916.033	03/01/2023 Bero Second Rebuttal Schedule 13.1	403, 801, 802
916.034	03/01/2023 Bero Second Rebuttal Schedule 13.2	403, 801, 802
916.035	03/01/2023 Bero Second Rebuttal Schedule 14.0	403, 801, 802
916.036	03/01/2023 Bero Second Rebuttal Schedule 15.0	403, 801, 802

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
916.037	03/01/2023 Bero Second Rebuttal Schedule 15.1	403, 801, 802
916.038	03/01/2023 Bero Second Rebuttal Schedule 16.0	403, 801, 802
916.039	03/01/2023 Bero Second Rebuttal Schedule 16.1	403, 801, 802
916.040	03/01/2023 Bero Second Rebuttal Schedule 16.2	403, 801, 802
917.001	10/25/2024 Bero Second Rebuttal Schedule 1.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.002	10/25/2024 Bero Second Rebuttal Schedule 2.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.003	10/25/2024 Bero Second Rebuttal Schedule 2.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.004	10/25/2024 Bero Second Rebuttal Schedule 2.2 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.005	10/25/2024 Bero Second Rebuttal Schedule 3.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.006	10/25/2024 Bero Second Rebuttal Schedule 3.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.007	10/25/2024 Bero Second Rebuttal Schedule 4.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.008	10/25/2024 Bero Second Rebuttal Schedule 4.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.009	10/25/2024 Bero Second Rebuttal Schedule 4.2 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.010	10/25/2024 Bero Second Rebuttal Schedule 4.3 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
917.011	10/25/2024 Bero Second Rebuttal Schedule 4.4 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.012	10/25/2024 Bero Second Rebuttal Schedule 4.5 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.013	10/25/2024 Bero Second Rebuttal Schedule 5.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.014	10/25/2024 Bero Second Rebuttal Schedule 5.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.015	10/25/2024 Bero Second Rebuttal Schedule 5.2 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.016	10/25/2024 Bero Second Rebuttal Schedule 5.3 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.017	10/25/2024 Bero Second Rebuttal Schedule 6.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.018	10/25/2024 Bero Second Rebuttal Schedule 7.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.019	10/25/2024 Bero Second Rebuttal Schedule 8.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.020	10/25/2024 Bero Second Rebuttal Schedule 8.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.021	10/25/2024 Bero Second Rebuttal Schedule 8.2 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.022	10/25/2024 Bero Second Rebuttal Schedule 9.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.023	10/25/2024 Bero Second Rebuttal Schedule 9.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.024	10/25/2024 Bero Second Rebuttal Schedule 10.0	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26

EX. NO.	PLAINTIFF'S DESCRIPTION	DEFENDANT'S OBJECTIONS
917.025	10/25/2024 Bero Second Rebuttal Schedule 10.1	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.026	10/25/2024 Bero Second Rebuttal Schedule 11.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.027	10/25/2024 Bero Second Rebuttal Schedule 11.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.028	10/25/2024 Bero Second Rebuttal Schedule 11.2 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.029	10/25/2024 Bero Second Rebuttal Schedule 12.0	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.030	10/25/2024 Bero Second Rebuttal Schedule 12.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.031	10/25/2024 Bero Second Rebuttal Schedule 12.2 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.032	10/25/2024 Bero Second Rebuttal Schedule 13.0 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.033	10/25/2024 Bero Second Rebuttal Schedule 13.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.034	10/25/2024 Bero Second Rebuttal Schedule 13.2 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.035	10/25/2024 Bero Second Rebuttal Schedule 14.0	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.036	10/25/2024 Bero Second Rebuttal Schedule 15.0	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26
917.037	10/25/2024 Bero Second Rebuttal Schedule 15.1 - Updated	106, 401, 402, 403, 702, 703, 801, 802 and Fed. R. Civ. P 26

1 Dated: October 28, 2024

By: /s/ Kenneth A. Gallo
Kenneth A. Gallo

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5 Attorneys for *Defendant*
6 *Intuitive Surgical, Inc.*

CERTIFICATE OF SERVICE

On October 28, 2024, I caused a copy of Intuitive's Objections to Plaintiff SIS's Trial Exhibits to be electronically served via email on counsel of record for Surgical Instrument Service Company, Inc.

Dated: October 28, 2024

By: /s/ Kenneth A. Gallo
Kenneth A. Gallo